Mammoth Disposal Transfer Station Expansion Project

Initial Study/Mitigated Negative Declaration

Public Review Draft | May 2021

Submitted to:

Town of Mammoth Lakes

Submitted by:

Michael Baker INTERNATIONAL

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PUBLIC REVIEW DRAFT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Mammoth Disposal Transfer Station Expansion Project

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May 2021

JN 181877

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INITIAL STUDY / MITIGATED NEGATIVE DECLARATION AND TECHNICAL APPENDICES ON CD

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1.0 INTRODUCTION

The proposed Mammoth Disposal Transfer Station Expansion Project (project) is located within the Town of Mammoth Lakes (Town), in the southwestern portion of Mono County. The project site comprises two separate sites at 59 Commerce Drive (1.87 acres; Assessor's Parcel Numbers [APN] 037-200-049 and 037-200-050) and 264 Commerce Drive (0.55 acres; APN 037-200-061). Regional access is provided to the project site via State Route 203 (SR-203), approximately 0.1-mile to the north, and U.S. Route 395, approximately 1.6 miles to the east. The project proposes to 1) expand the existing transfer station at the 59 Commerce Drive Site, 2) relocate the buy-back/recycling center (currently at the 59 Commerce Drive Site) to the 264 Commerce Drive Site, and 3) relocate the fleet maintenance operations (currently at the 264 Commerce Drive Site) to the 59 Commerce Drive Site. The proposed project is discussed in detail in Section 2.0, Project Description. Following a preliminary review of the proposed project, the Town of Mammoth Lakes has determined that it is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). This Initial Study addresses the direct, indirect, and cumulative environmental effects of the project, as proposed.

1.1 STATUTORY AUTHORITY AND REQUIREMENTS

In accordance with the CEQA (Public Resources Code Section 21000-21177) and pursuant to California Code of Regulations (CCR) Section 15063, the Town of Mammoth Lakes (Town), acting in the capacity of Lead Agency, is required to undertake the preparation of an Initial Study to determine if the proposed project would have a significant environmental impact. If, as a result of the Initial Study, the Lead Agency finds that there is evidence that any aspect of the project may cause a significant environmental effect, the Lead Agency shall further find that an Environmental Impact Report (EIR) is warranted to analyze project-related and cumulative environmental impacts. Alternatively, if the Lead Agency finds that there is no evidence that the project, either as proposed or as modified to include the mitigation measures identified in the Initial Study, may cause a significant effect on the environment, the Lead Agency shall find that the proposed project would not have a significant effect on the environment and shall prepare a Negative Declaration for that project. Such determination can be made only if "there is no substantial evidence in light of the whole record before the Lead Agency" that such impacts may occur (Public Resources Code Section 21080(c)).

The environmental documentation, which is ultimately selected by the Town in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for subsequent discretionary actions upon the project. The resulting documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approvals would be required.

The environmental documentation and supporting analysis is subject to a public review period. During this review, public comments on the document relative to environmental issues should be addressed to the Town. Following review of any comments received, the Town will consider these comments as a part of the project's environmental review and include them with the Initial Study documentation for consideration by the Town.

1.2 PURPOSE

CEQA Guidelines Section 15063 identifies specific disclosure requirements for inclusion in an Initial Study. Pursuant to those requirements, an Initial Study shall include:

- A description of the project, including the location of the project;
- Identification of the environmental setting;
- Identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
- Discussion of ways to mitigate significant effects identified, if any;
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls; and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study.

1.3 CONSULTATION

As soon as a Lead Agency (in this case, the Town of Mammoth Lakes) has determined that an Initial Study would be required for the project, the Lead Agency is directed to consult informally with all Responsible Agencies and Trustee Agencies that are responsible for resources affected by the project, to obtain the recommendations of those agencies as to whether an EIR or Negative Declaration should be prepared for the project. Following receipt of any written comments from those agencies, the Lead Agency considers any recommendations of those agencies in the formulation of the preliminary findings. Following completion of this Initial Study, the Lead Agency initiates formal consultation with these and other governmental agencies as required under CEQA and its implementing guidelines.

1.4 INCORPORATION BY REFERENCE

The following documents were utilized during preparation of this Initial Study, and are incorporated into this document by reference. These documents are available for review at the Town of Mammoth Lakes Community and Economic Development Department, located at 437 Old Mammoth Road, Suite 230, Mammoth Lakes, CA 93546 and on the Town's website: http://www.townofmammothlakes.ca.gov.

- *Town of Mammoth Lakes General Plan* (as amended from 2007-2019). The Town of Mammoth Lakes Council adopted the *Town of Mammoth Lakes General Plan* (General Plan) on August 15, 2007 and has since been amended multiple times through 2019. The General Plan establishes standards, guidelines, and priorities that define the community now and for the future. The General Plan is organized by elements. Each element is introduced with an explanation of the intent of the goals, policies, and actions within that element. The General Plan contains the following elements:

- Economy;
- Arts, Culture, Heritage, and Natural History;
- Community Design;
- Neighborhood and District Character;
- Land Use;
- Noise;
- Housing;
- Mobility;
- Parks, Open Space and Recreation;
- Resource Management and Conservation; and
- Public Health and Safety.

It is noted that the Housing and Noise Elements were not updated as part of the 2007 General Plan Update. However, the Housing Element was updated and adopted in 2010, and has been subsequently updated multiple times. The most current 2019-2027 Housing Element was adopted August 7, 2019. Additionally, the Town Council amended the Parks, Open Space, and Recreation Element in 2012 with the addition of new policies and one additional goal, revoking the 1990 Parks and Recreation Element. In August 2019, the Town Council approved an update to the Safety Element pursuant to SB 1241 for fire hazard safety and SB 379 for the incorporation of climate adaptation and resiliency strategies.

- *Final Program Environmental Impact Report for the Town of Mammoth Lakes 2005 General Plan Update* (certified May 2007), SCH No. 2003042155. The *Final Program Environmental Impact Report for the Town of Mammoth Lakes 2005 General Plan Update* (General Plan PEIR) analyzed the environmental impacts associated with the update of the Town's General Plan. This update provided the Town's long-range comprehensive direction to guide future development and identified the community's environmental, social, and economic goals. The General Plan PEIR document was prepared as a Program EIR, which is intended to facilitate consideration of broad policy directions, program-level alternatives, and mitigation measures consistent with the level of detail available for the plan. The General Plan PEIR concluded significant and unavoidable impacts regarding aesthetics, air quality, biological resources, public safety and hazards, noise, public services and utilities, and recreation.

- *Town of Mammoth Lakes General Plan Land Use Element/Zoning Code Amendments and Mobility Element Update Draft Environmental Impact Report* (October 2016), SCH No. 2015052072. During the course of the Town's Zoning Code Update, a proposal was made to use floor area ratio (FAR) to regulate the intensity of development in the Town's commercial zoning districts. In response, the *Town of Mammoth Lakes General Plan Land Use Element/Zoning Code Amendments and Mobility Element Update Draft Environmental Impact Report* (Land Use Element/Zoning Code Amendments and Mobility Element Update DEIR) analyzed the impact of implementing a FAR standard with no unit or room density limitations within the Town's commercial areas. The Land Use Element/Zoning Code Amendments and Mobility Element Update DEIR concluded significant and unavoidable impacts regarding air quality and public services.

- *Town of Mammoth Lakes Municipal Code* (current through Ordinance No. 20-10). The *Town of Mammoth Lakes Municipal Code* (Municipal Code) consists of all the regulatory and penal ordinances and administrative ordinances of the Town of Mammoth Lakes. It is the method the Town uses to implement control of land uses, in accordance with General Plan goals and policies. Municipal Code Title 17, *Zoning*, is the Zoning Ordinance for the Town, which identifies land uses permitted and prohibited according to the zoning category of particular parcels.

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The proposed Mammoth Disposal Transfer Station Expansion Project (project) is located within the Town of Mammoth Lakes (Town), in the southwestern portion of Mono County; refer to Exhibit 2-1, *Regional Vicinity*. The project site comprises two separate sites at 59 Commerce Drive (1.87 acres; Assessor's Parcel Numbers [APN] 037-200-049 and 037-200-050) and 264 Commerce Drive (0.55 acres; APN 037-200-061). The two sites (from herein referenced together as "project site" or individually as "59 Commerce Drive Site" and "264 Commerce Drive Site") are located approximately 800 feet from each other along Commerce Drive; refer to Exhibit 2-2, *Site Vicinity*. Regional access is provided to the project site via State Route 203 (SR-203), approximately 0.1-mile to the north, and U.S. Route 395, approximately 1.6 miles to the east.

2.2 ENVIRONMENTAL SETTING

The Mammoth Disposal Company (Mammoth Disposal) currently operates an existing small volume transfer station and buy-back/recycling center at the 59 Commerce Drive Site. The facility serves the Town and other areas of Mono County under an approved franchise agreement with the Town. The 264 Commerce Drive Site is developed with Mammoth Disposal's vehicular fleet maintenance facility with the remainder of the site utilized for truck (fleet) parking. Both facilities are located within the Mammoth Lakes Business Park (within the Town's Industrial zoning district).

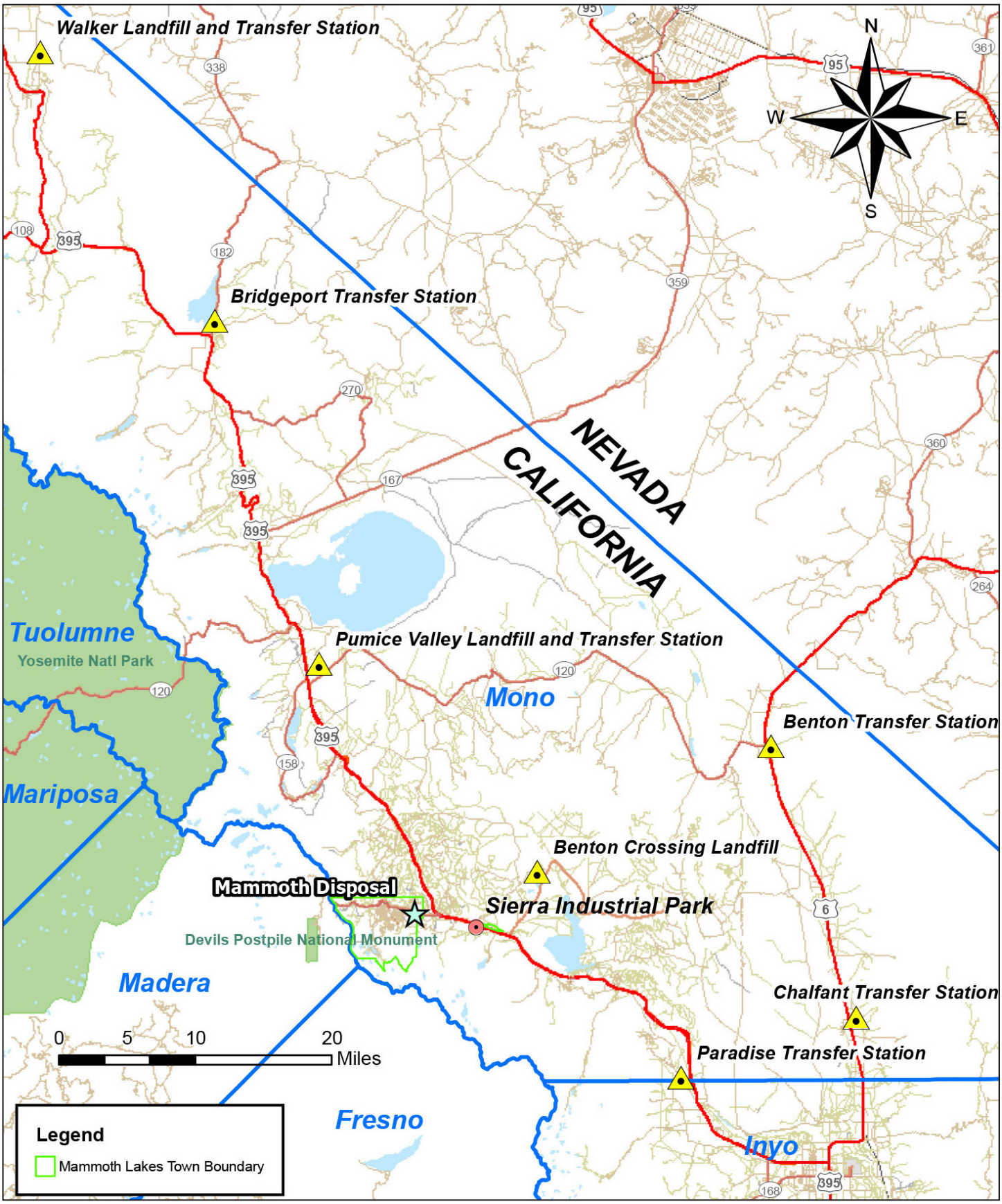
SURROUNDING LAND USES

Predominant surrounding land uses include industrial, single-family residential, and open space. Table 2-1, *Surrounding Land Uses*, specifically describes the project site's surrounding development and associated land use designations and zoning districts.

Table 2-1
Surrounding Land Uses

Direction	General Plan Designation[1]	Zoning[2]	Existing Development
North	Industrial (I); Open Space (OS)	Industrial; Public and Quasi Public	Industrial uses and open space are located north of the project's northern boundary. Further north is SR-203 and additional open space.
East	Industrial (I); Open Space (OS)	Industrial; Public and Quasi Public	Meridian Boulevard is located to the east of the project site. Across Meridian Boulevard is the Mammoth Community Water District main office facilities and Wastewater Recycled Water Treatment Plant and open space.
South	Institutional Public (IP); Open Space (OS); Low Density Residential 2 (LDR-2)	Public and Quasi Public; Residential Single-Family	Industrial uses, Volcom Brothers Skate Park, and single-family residential uses are located south of the project site. Further south is Meridian Boulevard and vacant open space.
West	Industrial (I); Low Density Residential 2 (LDR-2); Institutional Public (IP)	Public and Quasi Public; Residential Single-Family	Industrial uses, single-family residential uses, and open space are located to the west. Mammoth Mountain RV Park and Mammoth Elementary School are located further west.

Sources:
1. Town of Mammoth Lakes, *Town of Mammoth Lakes General Plan 2007, Figure 5, Land Use Diagram,* 2007.
2. Town of Mammoth Lakes, *Mammoth Lakes Zoning Map,* June 2018.



Source: Lawrence & Associates, 2020.

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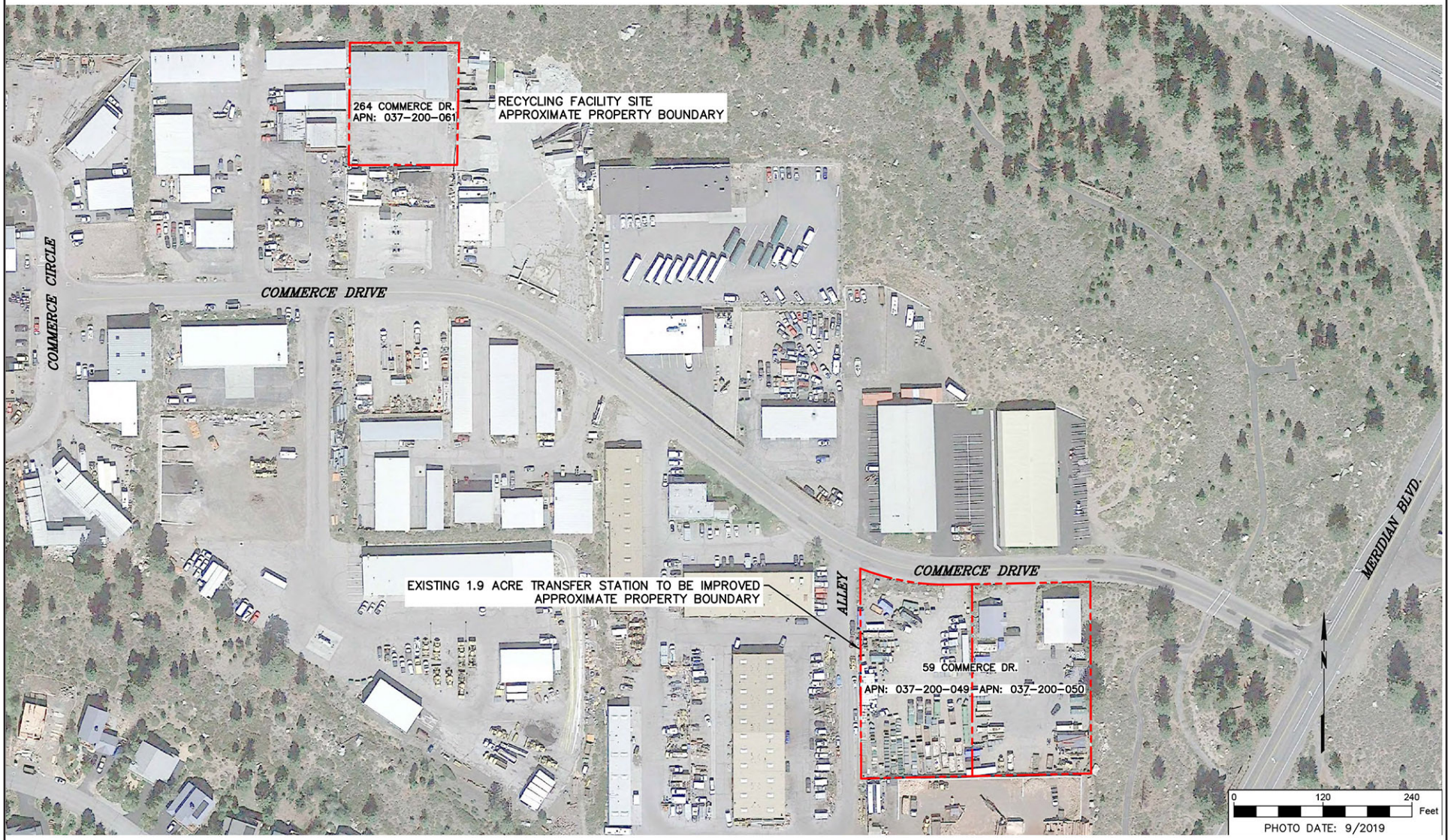
MAMMOTH DISPOSAL TRANSFER STATION EXPANSION PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Regional Vicinity

Exhibit 2-1



Source: Lawrence & Associates, 2020.

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MAMMOTH DISPOSAL TRANSFER STATION EXPANSION PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Site Vicinity

Exhibit 2-2

2.2.1 EXISTING OPERATIONS AND FACILITIES

59 COMMERCE DRIVE SITE

The 59 Commerce Drive Site is currently developed with a public small volume transfer station, buy-back/recycling center, and company office. The transfer station is open to the public Monday through Saturday from 6:30 a.m. to 7:00 p.m. and Sundays from 6:30 a.m. to 5:00 p.m. The buy-back/recycling center is open to the public from 9:00 a.m. to 3:00 p.m. Tuesday through Saturday. Both the transfer station and buy-back/recycling center areas are operated by facility staff prior to and after closing to prepare the facility. On-site staff include three employees for the transfer station and three employees for the buy-back/recycling center. The company office is open to the public from 8:00 a.m. to 4:00 p.m. Monday through Friday and is staffed by six employees, three of which remain at the office and the other three are managers with only a portion of their time spent at the office.

As shown on Exhibit 2-3, *Transfer Station Facility Existing Conditions*, existing structures on-site include a 1,200-square foot office building, guard/attendant shed, outdoor transfer station (primarily consisting of bins and containers), 3,050-square foot buy-back/recycling center building, and an outdoor bin storage area. Roughly one-third of the eastern half of the site is paved and the remainder is graveled. Snow storage is also provided on-site and is periodically removed by a third-party vendor.

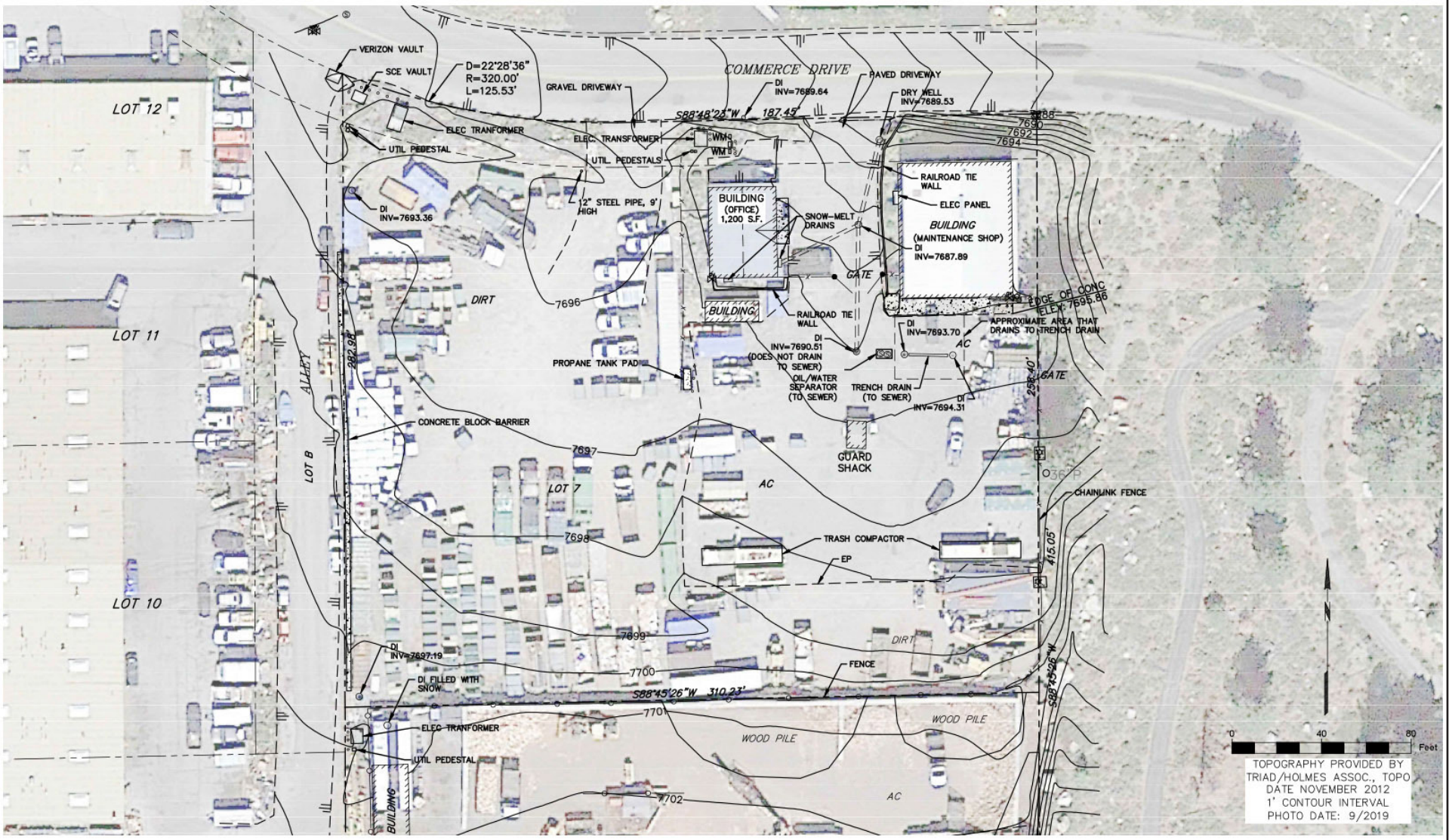
The 59 Commerce Drive Site has chain linked fencing with slats along the eastern and southern boundary and a concrete block barrier along the western boundary facing an industrial alley. The site is accessed via two driveways (one paved and one gravel) along Commerce Drive.

Transfer Station

The purpose of a solid waste transfer station is to receive municipal solid waste then sort, compact, and transport such waste to an off-site end point. As such, no actual landfilling activities occur on-site. The existing on-site transfer station (located at 59 Commerce Drive) serves the Town and other areas of Mono County under an approved franchise agreement between the Town and Mammoth Disposal. The existing facility operates under Use Permit 98-8 (issued by the Town) and is permitted under a solid waste facilities permit (SWFP) (issued by Mono County [County] as the Local Enforcement Agency [LEA] identified by the California Department of Resources Recycling and Recovery [CalRecycle]). Under the SWFP, the existing transfer station can accept up to 15 tons of waste per day. Currently, the transfer station accepts an average of two to four tons of non-industrial waste per day. Accepted waste includes household trash; household hazardous waste; bulky items (e.g., furniture and appliances); green waste (e.g., pine needles and yard debris); construction debris; ashes, electronics, and metal.

Buy-Back/Recycling Center

The buy-back/recycling center (currently located at 59 Commerce Drive) includes an attendant area, collection bins and containers, and a building where collected materials are sorted and packaged. Similar to the existing transfer station, the center accepts recyclable materials from the Town and surrounding areas of Mono County; sorts, bales, or otherwise organizes the materials for shipping; and ships the resulting commodities to various bulk recyclers or processing facilities. Accepted materials include cardboard, paper, aluminum, tin, plastic, glass, household hazardous waste, etc. Mattresses and box springs are also accepted. Containers with a California Redemption Value (CRV) can be redeemed at the buy-back portion of the facility.



Source: Lawrence & Associates, 2020.

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Transfer Station Facility Existing Conditions

Exhibit 2-3

Currently, the existing buy-back/recycling center receives an average of approximately 2.3 tons per day with an estimated peak of 3.2 tons per day.

264 COMMERCE DRIVE SITE

The 264 Commerce Drive Site, also owned and operated by Mammoth Disposal, is currently developed with a vehicular fleet maintenance facility with the remainder of the site utilized for truck (fleet) parking. The metal fleet maintenance building is 6,800 square feet in size and 28 feet in height.

The fleet maintenance facility is currently open from 6:30 a.m. to 5:00 p.m. Monday through Friday, depending on snow conditions and other needs when mechanic support is required outside of these hours. The fleet maintenance facility staff includes two mechanics and 12 drivers.

The site is entirely paved with non-irrigated landscaping along the western boundary. Vehicular access is provided by one paved driveway at Commerce Drive and crosses two separate private parcels via an access easement.

2.3 EXISTING GENERAL PLAN AND ZONING

Based on the *Town of Mammoth Lakes General Plan 2007* (General Plan), the entire project site (i.e., the 59 Commerce Drive and 264 Commerce Drive Sites) is designated Industrial (I). According to the General Plan, the designation "I" allows a limited variety of light manufacturing and service uses that can be contained within wholly enclosed structures.

The entire project site is located within the Town's Industrial zoning district. According to the *Town of Mammoth Lakes Municipal Code* (Municipal Code), the Industrial zoning district is intended for viable industrial uses distanced from residential uses or other incompatible uses in order to protect residential and commercial uses from noise, odor, dust, smoke, truck traffic, and other objectionable influences incidental to certain industrial uses. The purpose of the Industrial zoning district is also to provide an area for light industrial and limited service type uses that minimize impacts on adjacent land use patterns and the environment.

2.4 PROJECT BACKGROUND

Municipal solid waste received from the Town of Mammoth Lakes, and surrounding communities, is currently disposed of at the existing Benton Crossing Landfill, located in unincorporated Mono County approximately 9.5 miles northeast from the Town. The landfill is currently permitted to accept up to 500 tons per day and operates six days a week. In 2019, the Benton Crossing Landfill accepted approximately 23,942 tons of waste (an approximate average of 75 tons per day). The landfill is anticipated to reach capacity and will stop receiving waste by January 1, 2023. As such, one of the requirements for the existing transfer station is to increase municipal solid waste handling volume capacity for the Town and surrounding communities, prior to being disposed of offsite. The proposed project is anticipated to be operational prior to June 2022 (at least six months prior to the anticipated Benton Crossing Landfill closure).

As stated, the existing transfer station operates under Use Permit 98-8 issued by the Town and a SWFP through CalRecycle and as administered by the County. In order to permit and construct a higher volume capacity transfer station, a new Use Permit (through the Town) and new SWFP (through CalRecycle and the County as LEA) would be required.

2.5 PROJECT CHARACTERISTICS

2.5.1 PROJECT DESCRIPTION

The Mammoth Disposal Transfer Station Expansion Project proposes to 1) expand the existing transfer station at the 59 Commerce Drive Site, 2) relocate the buy-back/recycling center (currently at the 59 Commerce Drive Site) to the 264 Commerce Drive Site, and 3) relocate the fleet maintenance operations (currently at the 264 Commerce Drive Site) to the 59 Commerce Drive Site. Proposed development and operations at each of the two sites are described in further detail below.

59 COMMERCE DRIVE SITE

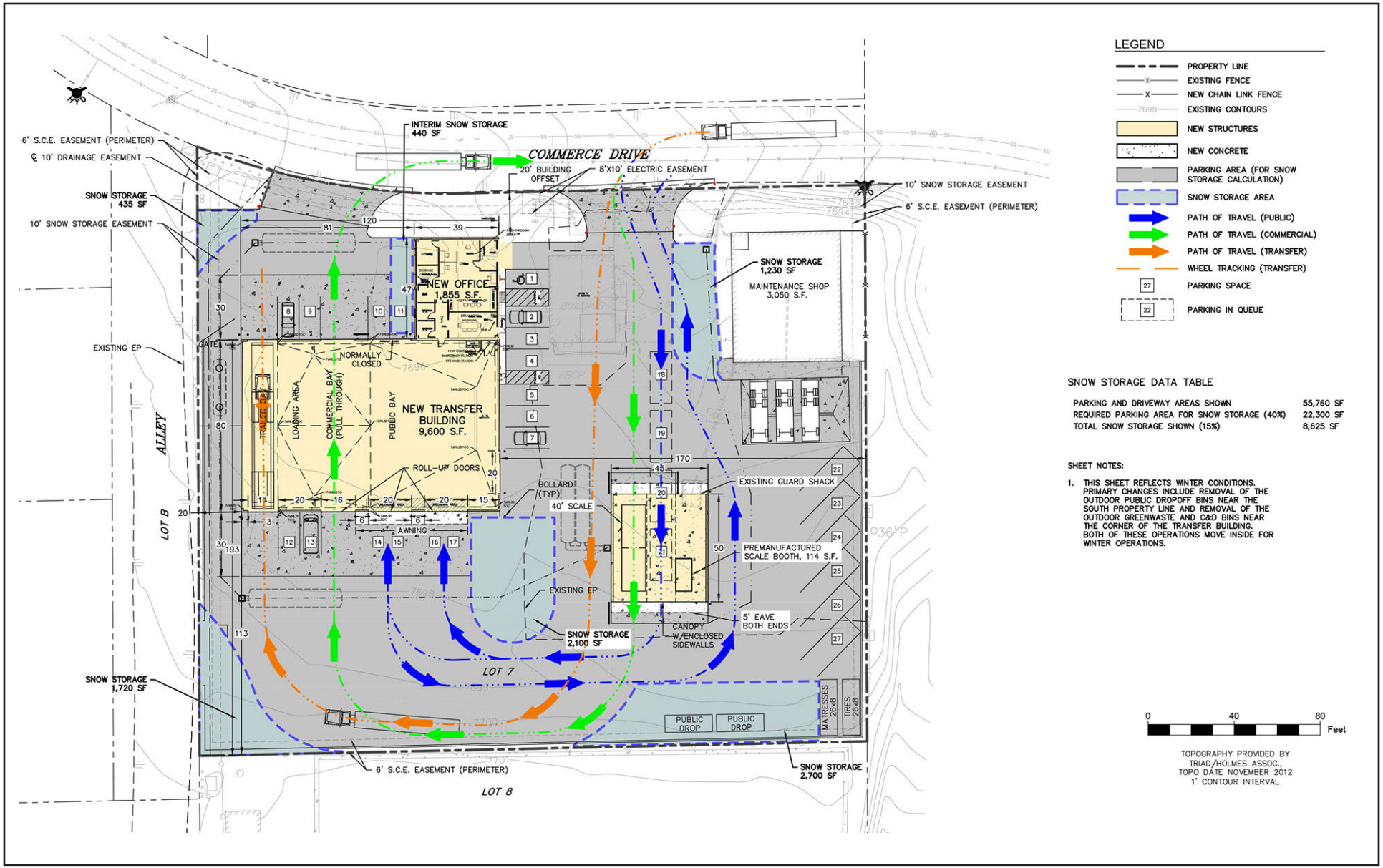
As shown on Exhibit 2-4, *Transfer Station Facility Conceptual Site Plan*, the proposed improvements at the 59 Commerce Drive Site involve:

- Construction of a 9,600-square foot transfer station building;
- Replacement of the guard/attendant shed with a pre-manufactured approximately 200-square foot scale house;
- Installation of truck scales near the proposed scale house;
- Installation of a 2,250-square foot metal canopy structure over the proposed truck scales and scale house;
- Construction of a new approximately 1,855-square foot office building (and demolition of the existing 1,200-square foot office building);
- Repurposing of the existing 3,050-square foot buy-back/recycling center building with the relocated fleet maintenance facility from the 264 Commerce Drive Site;
- Abandonment of existing underground stormwater management infrastructure and construction of new underground stormwater retention facilities; and
- Connection of a new fire sprinkler and liquid propane gas laterals.
- New pavement for site circulation and parking areas.
- Construction of a 10-foot masonry perimeter wall located at the east, south and west sides of the property.

The expanded transfer station facility would be open from 6:30 a.m. to 9:00 p.m. seven days a week with approximately 25 employees (five employees for the transfer station, six employees in the office, and 14 employees for the fleet maintenance facility consisting of two mechanics and 12 drivers). In total, the project would result in three net new employees, two additional employees staffed at the transfer station and one additional employee staffed at the buy-back/recycling center.

Transfer Station Building

The new transfer station building would have an interior-sloping floor design to a self-contained fluid collection system, a loading bay with axle scales, one pull-through commercial bay for route trucks, and four back-up slots for public unloading. As shown on Exhibit 2-5, *Transfer Station Building Elevations*, the building would have a metal roof with translucent plastic panels and louvered vents. Roll-up doors would be located on the northern, eastern, and southern building elevations. A common wall and door would connect the transfer



Source: Lawrence & Associates, 2021.

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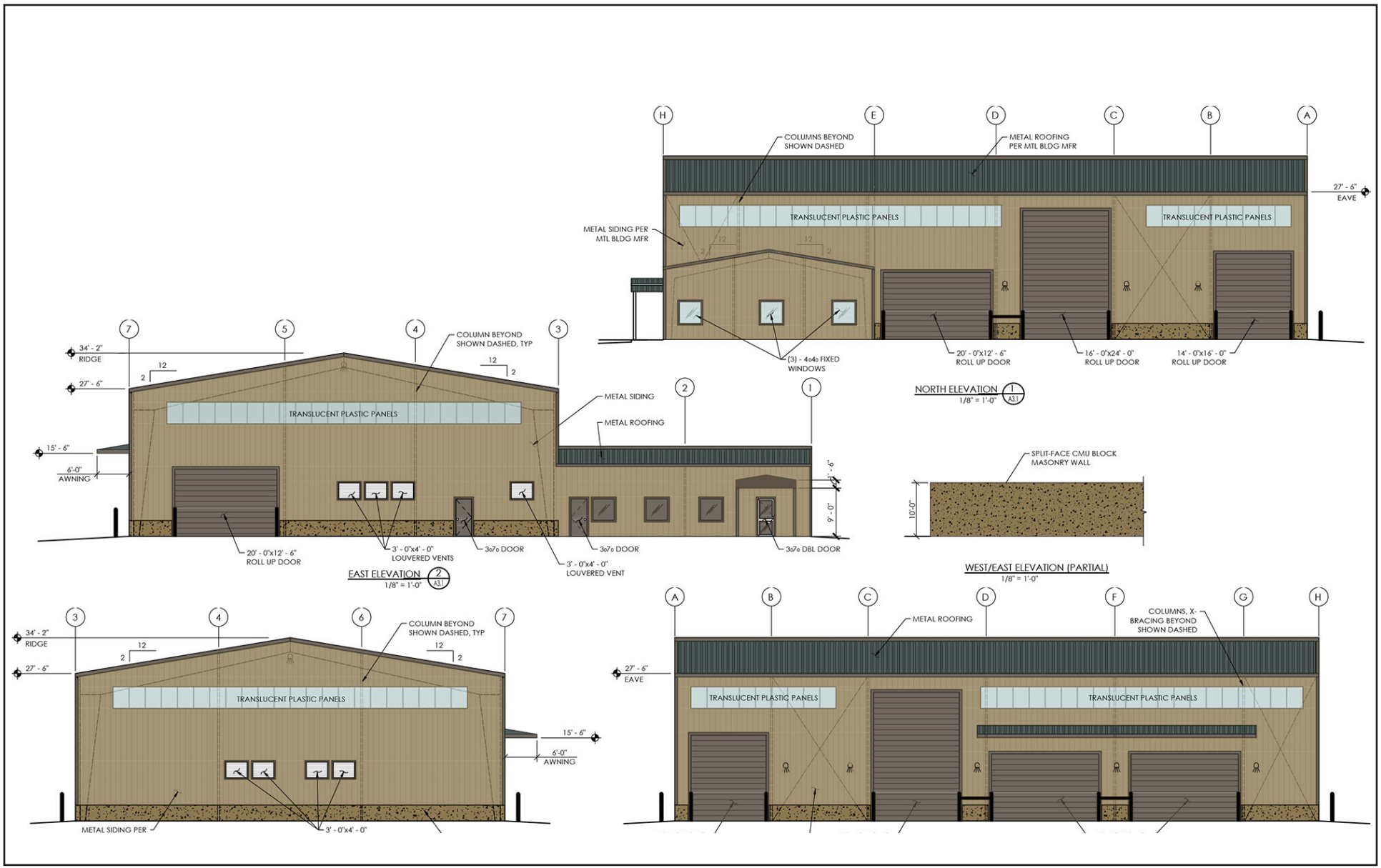
MAMMOTH DISPOSAL TRANSFER STATION EXPANSION PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Transfer Station Facility Conceptual Site Plan

Exhibit 2-4



Source: Lawrence & Associates, 2021.

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MAMMOTH DISPOSAL TRANSFER STATION EXPANSION PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Transfer Station Building Elevations

Exhibit 2-5

station building with the office building. The transfer station building would have a maximum building height of 35 feet. The project proposes to protect the transfer station building floor from vectors by closing the building doors at night. Transfer trailers containing municipal solid waste would either be parked in the building overnight or left outside and covered to minimize the propagation or attraction of flies, rodents, or other vectors. All municipal solid waste is removed within 72 hours of receipt to minimize odors and vectors as well. Last, the proposed transfer station building would include a misting system to control dust and minimize odors.

It is assumed that recyclables would be taken to the buy-back/recycling center (proposed to be relocated to the 264 Commerce Drive Site) and thus, the transfer station would receive only municipal solid waste, construction and demolition debris, and wood waste and green waste debris. Based on these assumptions, the expanded transfer station facility is anticipated to receive an average of 78 tons per day with a peak throughput of 301 tons per day. Under the SWFP, the facility would be permitted to receive up to 500 tons per day. Nevertheless, the facility is designed to handle a throughput of up to 543 tons per day and has a storage capacity (floor space) of 144 tons.

Additionally, while the transfer station facility is anticipated to receive an average of 182 vehicle trips per day with a peak of 284 trips per day, it is designed and permitted to process a peak of 400 trips per day.

Waste would be dumped to the tipping floor on-site and then moved directly to large haul trucks for transport to other landfill facilities located further from waste source locations. At this time, the specific end point of the waste is unknown.

Fleet Maintenance Facility

The project proposes to relocate the existing fleet maintenance facility at the 264 Commerce Drive Site to the 59 Commerce Drive Site. Specifically, the fleet maintenance facility would be relocated to the existing 3,050-square foot building, which is currently being used as the buy-back/recycling center. Mammoth Disposal vehicles, including route trucks, fork trucks, roll-off trucks, and rolling stock would be cleaned and repaired at this facility. The building is accessed via two roll up doors and an entrance door at the south end of the building. Three parking spaces are provided for vehicles waiting to be repaired or for those not in service that day.

Office Building

Similar to existing conditions, the office building would serve as Mammoth Disposal's accounting office for billing and scheduling, in addition to the regional office for the company managers. The project would construct a new 1,856-square foot office building and demolish the existing 1,200-square foot office building. The new building would have a break room, locker room, conference room, and offices.

Access and Circulation

As shown on Exhibit 2-4, public, commercial, and transfer paths of travel in and out of the site vary slightly. The self-haul (public) vehicles would enter from the eastern driveway, pass by the scale house, and enter the back-up slots on the southern end of the new transfer building for unloading and turn around to exit from the same driveway. Mammoth Disposal route trucks and commercial vehicles would similarly enter from the eastern driveway and drive by the scale house; after entering the commercial bay of the transfer station building, the commercial vehicles would unload and then pull through to exit from the north towards the western driveway. Lastly, transfer trucks would similarly enter from the eastern driveway, enter the loading area of the transfer station building and exit from the north towards the western driveway. It is acknowledged

that the Town would impose a condition of approval that the project Applicant would install a rectangular rapid-flashing beacon (RRFB) with pedestrian activation at the Meridian Connector multi-use path crossing at Commerce Drive to minimize safety hazards for pedestrians and bicyclists at this location.

The two driveways would be paved for improved truck access. The Municipal Code requires a minimum of 1.6 parking spaces per 1,000 square feet of gross leasable space in Industrial zoning districts. As such, the proposed project's 14,506 square feet of gross leasable space would require 23 on-site parking spaces. As shown on Exhibit 2-4, the project would provide 27 on-site parking spaces, including unloading spaces, and would meet the Town's parking requirement.

Landscaping and Fencing

Natural stone boulders, shrubs, and six new trees are proposed along the Commerce Drive open areas, consistent with the existing landscaping of the business park. Additionally, concrete and asphalt concrete paving are proposed on the remainder of the site.

The project proposes a 10-foot tall split-face concrete masonry unit block wall along the site's east, south, and western boundary. A 30-foot wide opening in the western wall would be constructed as an emergency access from the adjacent alley and would include a 10-foot tall chain link fence as an emergency gate at this location. Per Municipal Code Section 17.36.040, *Fences and Walls*, a Variance is requested to increase the maximum fence height from 8 to 10 feet for facility security and screening purposes.

Snow Storage

For Industrial zoning districts, the Municipal Code requires a snow storage area equal to 40 percent of the site's parking, driveway, and circulation areas. The 59 Commerce Drive Site has approximately 55,760 square feet of parking area and thus, is required to provide approximately 22,300 square feet of snow storage area.

As shown on Exhibit 2-4, the project proposes snow storage areas mainly in the corners and southern portion of the 59 Commerce Drive Site, totaling approximately 8,625 square feet. Due to the physical site constraints, internal truck circulation and access requirements, and increased solid waste volume capacity of the transfer station facility, the project is requesting the option to provide a snow management plan for snow removal through the Use Permit application process, as an alternative to on-site snow storage per Municipal Code Section 17.36.110, *Snow Storage*. The identified snow storage areas on Exhibit 2-4 are areas to stage snow prior to removal by a third-party vendor.

Infrastructure

- *Water*. Water service is provided by the Mammoth Community Water District (MCWD) with an existing 0.75-inch connection at Commerce Drive. This connection is planned for continued use for proposed operations. In the event that utility conflicts occur during construction, a new 0.75-inch connection may be installed, which would remain in operation until the new office building is constructed. As such, the site may be served with two 0.75-inch connections for a short period of time, pending demolition and removal of the existing office building and meter.

- *Fire Suppression Water*. Fire suppression water is also provided by the MCWD with existing main lines along Commerce Drive. Two existing hydrants are located near the northeast and northwest corners of the site. The project would install a 48-inch lateral connection for a Fire Department

Connection (FDC) located near the street side of the new office building. The FDC would service both the new office and transfer station buildings (both sprinklered).

- *Sanitary Sewer*. Sanitary sewer service is currently provided by MCWD with an existing 6-inch lateral along Commerce Drive. The existing 6-inch lateral connection would be intercepted and extended to connect the sewer lines from the new transfer station and office building. The scale house and fleet maintenance building would not have sewer connections.

- *Drainage (Interior of Transfer Station)*. The transfer station tipping floor would be sloped to interior centralized drains that collect and convey drippings from the transfer station floor. The interior collection system would drain westerly to an underground retention tank. The tank would be equipped with a high-level float switch connected to a visible alarm in the transfer station building. Tank fluids would be pumped on an as-needed basis and disposed of at an appropriate facility.

- *Drainage (Site)*. The existing site is relatively flat with topography sloping one to three percent generally from south to north. An on-site storm drain system is located in the existing transfer station area, including a drywell near the main entrance to the facility and an infiltration trench located northwest of the existing office building that serves the existing bin storage areas. Surface drainage near the fleet maintenance building includes a concrete wash pad area internally sloping to a catch basin, dedicated oil/water separator, and retention tank.

  Proposed conditions include site grading generally less than two feet in depth to accommodate the new structures and buildings. Surface paving would be sloped towards collection drains/inlets and utilize an underground infiltration system. The existing drywell and infiltration trench would either be removed or abandoned and no longer used.

- *Gas*. An existing underground liquid propane gas (LPG) gas main abuts the project within Commerce Drive and is operated by Amerigas. The facility would connect to this underground LPG gas main and extend service to the office building via a lateral connection in Commerce Drive and an underground gas line within the property to the regulator and meter at the office building. The connection would serve both the office and transfer station buildings. An additional gas lateral may be added for the fleet maintenance building, or the existing LPG tank near the building may continue to be used.

- *Electric*. An existing transformer and electric panel are located at the facility and no main line extensions are required. A new subpanel would be installed on the side of the transfer station building. The existing underground power lines for the office building would be removed and new electricity service to the transfer station and office buildings would be provided via underground power lines from the existing panel at the relocated fleet maintenance facility building. The existing overhead power lines from the attendant shack to the relocated fleet maintenance facility building and overhead power lines from two light poles at the eastern property line would be removed. New service lines for the two light poles would be underground. Overall, all new electricity infrastructure would be underground and no existing overhead power lines on-site would remain.

264 COMMERCE DRIVE SITE

The project proposes to relocate the buy-back/recycling center (currently at the 59 Commerce Drive Site) to the 264 Commerce Drive Site. The buy-back/recycling center is anticipated to be open seven days a week from 6:30 a.m. to 9:00 p.m. with a total of four employees.

Buy-Back/Recycling Center

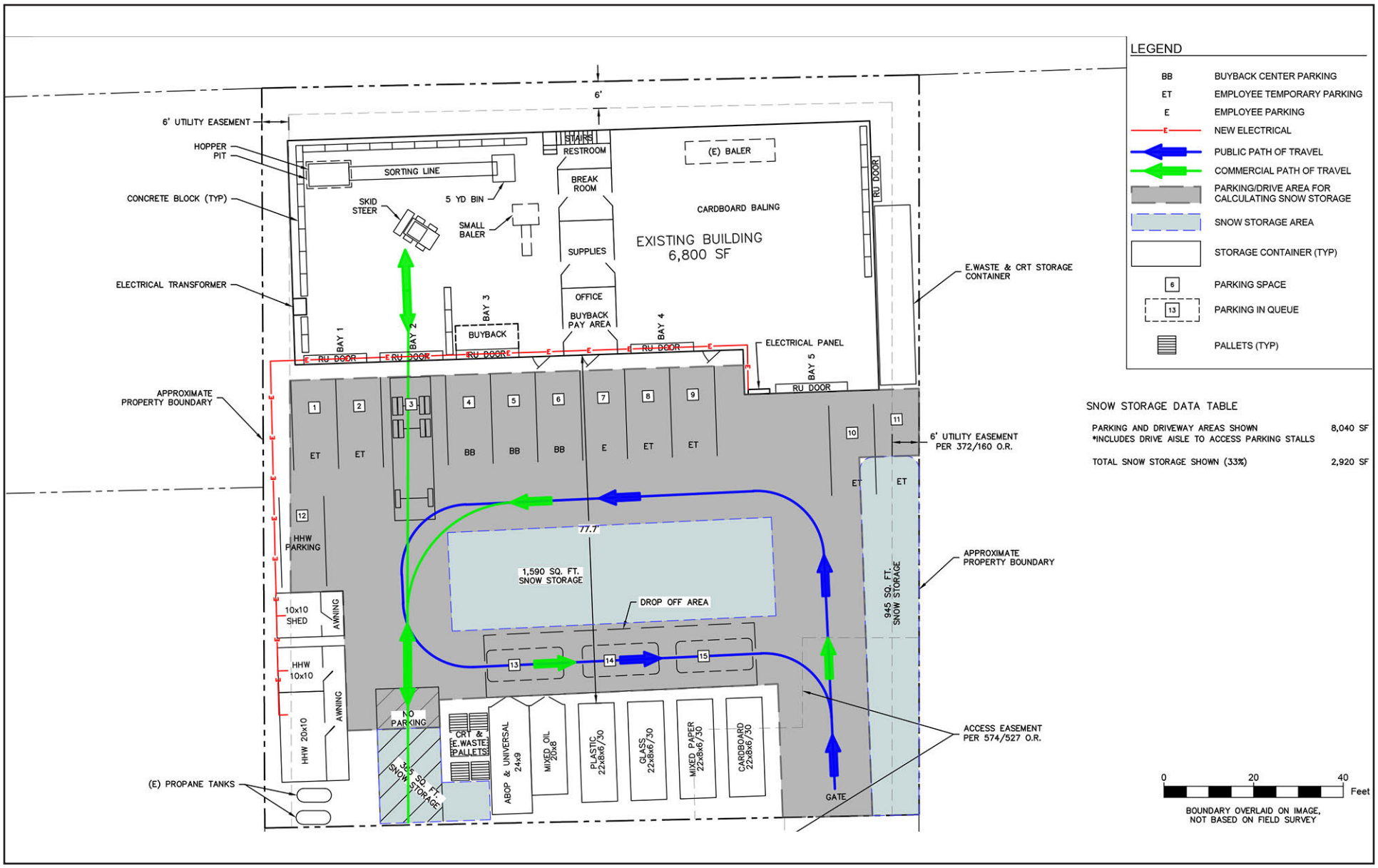
The existing 6,800-square foot building on-site, currently used for fleet maintenance, would be repurposed for the buy-back/recycling center. As shown on Exhibit 2-6, *Recycling Center Conceptual Site Plan*, the center would be divided into three major public operational areas: 1) a buy-back center for CRV containers; 2) a non-buy-back recycling center; and 3) a household hazardous waste recycling area. Non-public areas include a commercial unloading and curbside recyclables sorting area; commercial cardboard recycling and baling area; and a recyclables baling, loading, and transport area. To convert the building into a recycling center, the project proposes to move portable bins and equipment from the 59 Commerce Drive Site to the 264 Commerce Drive Site. No major physical improvements to the building or paved area are proposed, other than utility improvements. The proposed improvements on-site involve:

- Extending power to the household hazardous waste containers located outside of the existing building and to balers and sorting lines inside the building;
- Installing a concrete-lined depression for the sorting line hopper in the building;
- Placing portable concrete block crib walls inside the building;
- Installing other non-structural modifications as needed for recycling center use;
- Expanding the two existing drywells (with installation of a filter/sand-oil interceptor) to increase storage capacity;
- Intercepting and connecting the existing slotted drain and oil-water separator in front of the building to the drywell system (the former connection of the oil-waste separator to the public sewer system would be removed);
- Installing a new Asphaltic Concrete (AC) swale near the south end of the property to direct stormwater runoff from the site into the south drywell; and
- Constructing a 6-foot solid masonry wall along the south side of the property with the exception of a gated entry near the southeast corner. The wall is for screening purposes from Commerce Drive.

Upon implementation of the proposed project, the relocated buy-back/recycling is anticipated to average of approximately 11 tons per day and peak of 36 tons per day. While the relocated center is anticipated to generate an average of 90 trips per day with a peak of approximately 105 trips per day, it is designed to process a peak of 200 trips per day.

Access and Circulation

As shown on Exhibit 2-6, public and commercial paths of travel in and out of the site are slightly different. The public path of travel enters from the driveway; makes a counter-clockwise circle around the parking area to either of the three public drop-off areas for CRV container buy-backs, non-buy-back recycling, or household hazardous waste recycling; and exits from the same driveway. The commercial path of travel similarly enters and exits from the driveway and follows the same counter-clockwise circle around the parking area but has an area to back up into Bay 2 of the buy-back/recycling center building.



Source: Lawrence & Associates, 2021.

NOT TO SCALE

Michael Baker INTERNATIONAL

JN 181877 | 02/2021

MAMMOTH DISPOSAL TRANSFER STATION EXPANSION PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Recycling Center Conceptual Site Plan

Exhibit 2-6

As stated above, the Municipal Code requires a minimum of 1.6 parking spaces per 1,000 square feet of gross leasable space in Industrial zoning districts. As such, the 6,800-square foot building would require 11 parking spaces. Fourteen spaces are proposed, including three spaces in queue during unloading; refer to Exhibit 2-6.

Snow Storage

As stated, the Municipal Code requires Industrial zoned sites to provide a snow storage area equal to 40 percent of the site's parking area. The parking area, inclusive of the on-site drive aisle, totals 8,040 square feet and thus, would require 3,216 square feet (40 percent) of snow storage area.

As shown on Exhibit 2-6, the site would provide a total of 2,920 square feet of snow storage area (36 percent of the parking area). Since this is below the 40-percent requirement, the project is requesting the option to provide a snow management plan for snow removal through the Use Permit application process, as an alternative to on-site snow storage per Municipal Code Section 17.36.110, *Snow Storage*.

Infrastructure

- *Water*. Water service is provided by the MCWD with an existing 0.75-inch connection at Commerce Drive. No changes are proposed to the water supply connection.

- *Fire Suppression Water*. Fire suppression water is also provided by the MCWD existing main lines along Commerce Drive. Hydrants are located along Commerce Drive and the existing building on-site has a fire sprinkler system installed. No changes are proposed to the existing fire sprinkler system.

- *Sanitary Sewer*. Sanitary sewer service is provided by MCWD with an existing 6-inch lateral along Commerce Drive. This service is only required for the restroom facilities in the on-site building and no changes are proposed to the existing sanitary sewer service.

- *Drainage*. The existing site is relatively flat with topography sloping approximately one to three percent generally from north to south across impervious paved surfaces. The site has a system of trench drains and drop inlets/dry wells to control stormwater runoff. Existing drainage infrastructure would be required to comply with current Town requirements regarding site drainage. Although the proposed project is not anticipated to increase the runoff at this location, expansion of the existing drywells would be required to meet the existing Municipal Code requirements, and new infiltration chambers would be installed at the two existing drywell locations and the existing slotted drain and oil-waste separator would be disconnected from the public sewer system and reconnected to the proposed chambers.

- *Gas*. LPG is supplied by an existing tank near the southwest corner of the site. The LPG tanks are in close proximity to proposed wall locations and may be temporarily relocated during construction and replaced in the same general area post-construction. The gas is used for heating of the building and no changes are proposed for this utility.

- *Electric*. Electricity service is already provided at the existing building. A permit would be required to extend the underground electrical conductor from the service panel to the household hazardous waste container.

2.5.2 CONSTRUCTION

59 Commerce Drive Site

The existing transfer station would continue to operate during construction of the proposed project. As such, the existing guard/attendant shed and office building would remain operational through most construction activities. The guard/attendant shed would be removed once the proposed scale booth and canopy are ready to be constructed. It is noted that there would be a temporary period where the attendant is on-site, but not in a dedicated shed. Similarly, the existing office building would remain operational until the new office building is constructed.

The project's proposed improvements at the 59 Commerce Drive Site are anticipated to occur in one phase, with construction activities beginning in August 2021 through July 2022.

264 Commerce Drive Site

The existing fleet maintenance building would be repurposed for the relocated buy-back/recycling center and no major structural modifications or physical improvements to the building or parking area would occur. Installation of non-structural improvements, including the extension of electrical power and installation of a concrete-lined depression for the sorting line hopper and portable concrete block crib walls in the building would occur once the existing fleet maintenance activities are moved to the 59 Commerce Drive Site (anticipated to occur in summer 2021). Additionally, as stated, although the proposed project is not anticipated to increase the runoff at this location, should the Town require the existing drywells to be updated to meet the existing Municipal Code requirements, new infiltration chambers would be installed at the existing drywell location.

2.6 PERMITS AND APPROVALS

The Town of Mammoth Lakes is the Lead Agency under CEQA and has discretionary authority over the proposed project. The project would be subject to various Town permits and approvals, including, but not limited to:

- Certification of CEQA Environmental Clearance Document;
- Approval of Major Design Review DR 20-002 for the proposed structures located at the 59 Commerce Drive Site;
- Approval of Variance VAR 20-001 for fence/wall height increase at the 59 Commerce Drive Site;
- Approval of Use Permit UPA 20-001 for operations of the proposed transfer station facility at the 59 Commerce Drive Site;
- Approval of Use Permit UPA 20-004 for operations of the buy-back/recycling center at the 264 Commerce Drive Site; and
- Issuance of applicable grading, building, and encroachment permits.

In addition, the following permits/approvals may be required of other agencies:

- Solid Waste Facilities Permit – Mono County Environmental Health Department and CalRecycle;
- NPDES Construction General Permit – Lahontan Regional Water Quality Control Board;
- Construction Permit – Great Basin Unified Air Pollution Control District;

- Connection Permit – Mammoth Community Water District; and
- Fire Protection District Plan Review– Mammoth Lakes Fire Protection District.

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4.0 ENVIRONMENTAL EVALUATION

The following is a discussion of potential project impacts as identified in the Initial Study/Environmental Checklist. Explanations are provided for each item.

4.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?				✓
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			✓	
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			✓	

a) Have a substantial adverse effect on a scenic vista?

No Impact. The *Town of Mammoth Lakes General Plan 2007* (General Plan) encourages the maintenance of scenic public views and view corridors that visually connect the community to its surroundings (General Plan Policy C.2.W). General Plan Figure 1, *Major View Corridors and Vistas*, identifies existing view corridors and scenic vistas within the Town. As shown, the project site is not located within any identified scenic corridors. Thus, project implementation would not have a substantial adverse effect on a scenic vista, as identified by the Town's General Plan. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

No Impact. Based on the California Department of Transportation's California State Scenic Highway System Map, there are no Officially Designated State Scenic Highways near the project site.[1] The closest Eligible State Scenic Highway is SR-203, which trends in an east/west direction approximately 0.1-mile to the north of the project site. The nearest Officially Designated State Scenic Highway is U.S. Route

[1] California Department of Transportation, *California State Scenic Highway System Map*, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983, accessed February 2, 2021.

395 (Highway 395), located approximately 1.7 miles to the east of the project site. Although in relatively close proximity to SR-203, views of the project site are not afforded from SR-203 or Highway 395 due to intervening topography and vegetation. Thus, project development would have no impact on scenic resources within a State scenic highway.

Mitigation Measures: No mitigation measures are required.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The project site is disturbed and located in an urbanized area of the Town. Surrounding areas are primarily comprised of industrial, open space, and residential uses. Based on the project's urbanized setting, the following analysis evaluates the project's potential to conflict with applicable zoning and other regulations governing scenic quality.

Construction

As discussed in Section 2.5.2, *Construction*, construction activities at the 59 Commerce Drive Site are anticipated to occur in one phase with a duration of 15 months. During this time, short-term construction activities, construction equipment, and truck traffic would be visible to nearby motorists, bicyclists, and trail users. The closest sensitive receptors to the 59 Commerce Drive Site are residential and recreational users to the south and east. However, intervening topography, existing industrial uses adjacent to the project site, and existing vegetation would screen sensitive receptors to the south and east from the project's proposed temporary construction activities. Additionally, as stated, proposed improvements on the 264 Commerce Drive Site are limited to construction of a 6-foot screening wall and drainage improvements and would only be publicly visible from adjacent industrial uses, as existing buildings and vegetation provides screening of the proposed wall and drainage infrastructure construction activities from sensitive receptors.

Given that construction activities on both the 59 Commerce Drive Site and 264 Commerce Drive Site would be temporary and predominantly screened from the nearest sensitive receptors, the project's construction-related impacts to visual character/quality of the project site and its surrounding areas would be less than significant.

Operations

Municipal Code Consistency

Municipal Code Section 17.28.030, *Industrial Zoning District Development Standards*, includes development standards that aid in governing scenic quality. Table 4.1-1, *Municipal Code Development Standards Governing Scenic Quality Consistency Analysis*, provides a consistency analysis of the proposed project and applicable development standards in the Municipal Code that govern scenic quality. Refer to Section 4.11, *Land Use and Planning*, for a discussion concerning the project's consistency with other applicable zoning requirements.

Table 4.1-1
Municipal Code Development Standards Governing Scenic Quality Consistency Analysis

Relevant Section	Consistency Analysis
Section 17.36.030, Exterior Lighting Nuisance Prevention. All outdoor lighting fixtures shall be designed, located, installed, aimed downward or toward structures, retrofitted if necessary, and maintained in order to prevent glare, light trespass, and light pollution. Maintenance. Fixtures and lighting systems shall be in good working order and maintained in a manner that serves the original design intent of the system. Lighting Levels. Outdoor lighting installations shall be designed to avoid harsh contrasts in lighting levels between the project site and the adjacent properties. Lamp Types. Metal halide or high pressure sodium lamps are preferred for all new commercial and industrial area lighting (parking lot and yard lights) and street lighting installed after the effective date of this section due to good color rendering and good energy efficiency. Low pressure sodium lamps may be used for area lighting, but are not preferred due to poor color rendering. Low wattage incandescent or compact fluorescent lamps are preferred for residential lighting. Fixture Types. All new outdoor lighting shall use full cut-off luminaries with the light source downcast and fully shielded with no light emitted above the horizontal plane.	Consistent. The project proposes to construct new structures on the 59 Commerce Drive Site, which would involve the installation of outdoor lighting fixtures. As part of the requested Use Permit, the project would also be required to submit an Outdoor Lighting Plan. The Outdoor Lighting Plan would include the manufacturer specification sheets, cut-sheets, or other manufacturer provided information for all proposed outdoor lighting fixtures to show fixture diagrams and light output levels in compliance with Municipal Code Section 17.36.030. The proposed location, mounting height, and aiming point of all outdoor lighting fixtures would also be identified. As such, the project would comply with the exterior lighting standards detailed in Municipal Code Section 17.36.030, *Exterior Lighting*.
Section 17.36.040, Fences and Walls Fence Height Limitations. Fences are subject to the height limitations shown in Table 17.36.040A. An increase in height may be granted by the Director for required retaining walls. - Industrial Zoning District: 8 feet; must be setback 10 feet from the property line along Commerce Drive or other access way off Commerce Drive. No fences are permitted within 10 feet of the property line along Commerce Drive. Prohibited Materials. The use of barbed wire, chain link, rope, electrified fence, glass, razor wire fence, or similar materials in conjunction with a fence or wall, or by itself within any zoning district, is prohibited except for the following cases: chain link is allowed for tennis courts or similar recreational facilities, pet enclosures of 200 square feet or less, industrial uses, utility companies, or in areas where there is a safety hazard. If chain link is used it shall be painted or coated in a dark green, brown, or black color.	Consistent. As detailed in Table 4.11-1, *Industrial Zoning District Consistency Analysis*, the project proposes a 10-foot tall split-face concrete masonry unit block wall along the 59 Commerce Drive Site's east, west, and southern boundary. A 30-foot wide opening in the western wall would be constructed as an emergency access from the adjacent alley, and would include a 10-foot tall chain link fence as an emergency gate at this location. Per Municipal Code Section 17.36.040, *Fences and Walls*, a Variance is requested to increase the maximum fence height from 8 to 10 feet for facility security (including increased protection from wildlife entering the transfer station facility) and screening purposes. Upon approval of the requested Variance, the project would be consistent with Section 17.36.040, *Fences and Walls*.
Section 17.36.080, Propane Tanks	Consistent. As summarized in Section 2.5.1, *Project Description*, an existing underground liquid propane gas

Table 4.1-1, continued

Relevant Section	Consistency Analysis
Setbacks. Propane tanks shall not be located in the front or street side yard setback areas unless authorized by the Director and Public Works Director based upon safety concerns or accessibility of the tank location. Propane tank location shall meet the requirements of the Mammoth Lakes Fire Protection District. Screening. Propane tanks shall be painted tan or light green. Propane tanks located within the front or street side setback area are subject to additional screening and protection from snow removal operations as approved by the Director. Shared Propane Tanks. When a propane tank is proposed to be shared between properties, a development or plot plan must be approved by the Department showing propane tank locations and gas lines. An agreement shall be recorded against the property to share an off-site tank or gas line among adjacent property owners.	(LPG) gas main abuts the 59 Commerce Drive Site. The transfer station and office buildings would connect to this LPG gas main. An additional gas lateral may be added to connect to the fleet maintenance building, or the existing LPG tank near the southeast corner of the building would continue to be used. Additionally, an existing LPG tank is located in the southwest corner of the 264 Commerce Drive Site. No changes are proposed to the existing propane tanks and no additional propane tanks are proposed as part of the project. Thus, the project would not conflict with Municipal Code Section 17.36.080, *Propane Tanks*.
Section 17.52.240, Outdoor Storage and Work Areas The outdoor storage of any materials or equipment not accessory to the primary use of the property, including lumber, inoperable vehicles, auto parts, appliances, pipe, drums, machinery, furniture, recycling, or trash which is readily visible from off-site is prohibited, unless otherwise allowed consistent with Chapter 17.28 (Industrial Zoning District). The storage of firewood to be used on the premises shall be allowed. - Location. The outdoor storage shall not be located within a front yard setback or any required parking or loading area consistent with Chapter 17.44 (Parking and Loading Standards). - Enclosure required. The outdoor area used for storage shall be entirely enclosed and screened by a solid wall and solid gate with a minimum height of six feet. - Operations. All raw materials, equipment, finished products, and other materials stored shall: a) not be placed outside the enclosed storage area; b) not be stored above the height of the enclosure, except for mechanical equipment; and c) be stored in a manner that they cannot be blown by wind from the enclosure.	Consistent. The existing transfer station facility operation at the 59 Commerce Drive Site consists of an outdoor transfer station (primarily consisting of bins and containers), buy-back/recycling center, and an outdoor bin storage area. The proposed project would construct a new transfer station building and move all bins and containers indoors. Thus, outdoor storage and work areas would mostly be eliminated with project implementation. As shown on Exhibit 2-4, *Transfer Station Facility Conceptual Site Plan*, only outdoor collection bins would be located at the southeast corner of the new transfer station building for green waste and construction and demolition debris, and the south east corner of the site for public drops off of small and non-weigh loads, as well as mattress and tire collection. Further, the project proposes to relocate the existing buy-back/recycling center from the 59 Commerce Drive Site to the 264 Commerce Drive Site. As such, existing recycling collection bins and containers would also be relocated to the 264 Commerce Drive Site. Exhibit 2-6, *Recycling Center Conceptual Site Plan*, illustrates the proposed location of the various storage containers. As shown, the containers would not be located within a required setback from Commerce Drive or any required parking or loading area. The site is also entirely enclosed and screened by solid walls along the site perimeters. As such, the project would comply with Municipal Code Section 17.52.240, *Outdoor Storage and Work Areas*.

Source: Town of Mammoth Lakes, *Mammoth Lakes Municipal Code*, current through Ordinance No. 20-10, passed September 2, 2020.

As indicated in Table 4.1-1, the proposed project would be consistent with applicable Municipal Code requirements governing scenic quality. Further, the project would be subject to a Major Design Review

for the proposed structures located at the 59 Commerce Drive Site. Per Municipal Code Section 17.88.040, *Scope of Design Review*, the Town would review the project plans to ensure appropriate and compliant building proportions, massing, and architectural details; site design, orientation, and circulation; parking; exterior building colors and materials; fence and wall heights, materials, and colors; location and screening of mechanical equipment and refuse storage areas; exterior lighting; landscaping; and signage. The Major Design Review process would enforce the Town's regulations governing scenic quality for the project site to ensure the proposed development complies with applicable standards.

General Plan Consistency

Table 4.1-2, *General Plan Policies Governing Scenic Quality Consistency Analysis*, discusses the project's consistency with applicable General Plan policies that govern scenic quality.

Table 4.1-2
General Plan Policies Governing Scenic Quality Consistency Analysis

Applicable Policies	Consistency Analysis
Community Design Element	
Goal C.2: Design the man-made environment to complement, not dominate, the natural environment.	
C.2.I. Policy: Achieve highest quality development that complements the natural surroundings by developing and enforcing design standards and guidelines.	Consistent. As analyzed in Sections 4.1, *Aesthetics*, and 4.11, *Land Use and Planning*, the project would comply with existing design standards and guidelines in the Municipal Code and General Plan.
C.2.J. Policy: Be stewards in preserving public views of surrounding mountains, ridgelines and knolls.	Consistent. Refer to response to 4.1(a). As discussed, the project would not adversely impact General Plan-identified view corridors and scenic vistas in the Town.
C.2.V. Policy: Building height, massing and scale shall complement neighboring land uses and preserve views to the surrounding mountains.	Consistent. Refer to response to Policy C.2.J. Additionally, the proposed structures would look and be similar in height to other existing industrial buildings in the Mammoth Lake Business Park, including a metal self-storage building directly across from the 59 Commerce Drive Site and other neighboring industrial buildings (e.g., truck loading docks, garages, and offices).
C.2.W. Policy: Maintain scenic public views and view corridors (shown in Figures 1 and 2) that visually connect community to surroundings.	Consistent. Refer to response to Policy C.2.J.
Goal C.3: Ensure safe and attractive public spaces, including sidewalks, trails, parks and streets.	
C.3.F. Policy: Underground utilities within the community.	Consistent. As stated in Section 2.5.1, existing overhead powerlines on the 59 Commerce Drive Site would be removed and installed underground. Overall, all new electricity infrastructure would be underground and no existing overhead power lines on-site would remain.
Goal C.4: Be stewards of natural and scenic resources essential to community image and character.	
C.4.B. Policy: To retain the forested character of the town, require use of native and compatible plant species in public and private developments and aggressive replanting with native trees.	Consistent. On the 59 Commerce Drive Site, natural stone boulders, shrubs, and six new Jeffrey pines (*Pinus Jeffrey*) are proposed along the Commerce Drive open areas, consistent with the existing landscaping of the business park.
C.4.C. Policy: Retain overall image of a community in a forest by ensuring that native trees are protected wherever	Consistent. There are no native trees on-site that could be removed or impacted by project implementation.

Table 4.1-2, continued

Applicable Policies	Consistency Analysis
possible and remain an important component of the community.	Additionally, the project proposes to plant six Jeffrey pines along the entryways to the 59 Commerce Drive Site.
Goal C.5: Eliminate glare to improve public safety. Minimize light pollution to preserve views of stars and the night sky.	
C.5.A. Policy: Require outdoor light fixtures to be shielded and down-directed so as to minimize glare and light trespass.	Consistent. In accordance with Municipal Code Section 17.36.030, *Exterior Lighting*, the project would be required to ensure all outdoor lighting fixtures are designed, located, installed, aimed downward or toward structures, retrofitted if necessary, and maintained in order to prevent glare, light trespass, and light pollution. Outdoor lighting installations would be designed to avoid harsh contrasts in lighting levels between the project site and the adjacent properties, and fixtures would use full cut-off luminaries with the light source downcast and fully shielded. To ensure compliance, an Outdoor Lighting Plan is required as part of the project's requested Use Permits.
C.5.C. Policy: Improve pedestrian safety by eliminating glare for motorists through use of non-glare roadway lighting. A light fixture's source of illumination shall not be readily visible at a distance. Number of fixtures used shall be adequate to evenly illuminate for pedestrian safety.	Consistent. Refer to response to Policy C.5.C.
Source: Town of Mammoth Lakes, *Town of Mammoth Lakes General Plan*, 2019.	

As shown, the project would be consistent with applicable General Plan policies governing scenic quality. As a result, implementation of the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. A potentially significant impact would occur if a new source of substantial light or glare causes an adverse effect on day or nighttime views. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprising highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point source lighting that contrasts with existing low ambient light conditions.

Construction

Short-term light and glare impacts associated with construction activities would likely be limited to nighttime lighting (for security purposes) in the evening hours. In accordance with Municipal Code Section 15.08.020, *Hours of Working*, construction activities are limited to the hours between 7:00 a.m. and 8:00 p.m., Monday through Saturday with work prohibited on Sundays and Town-recognized

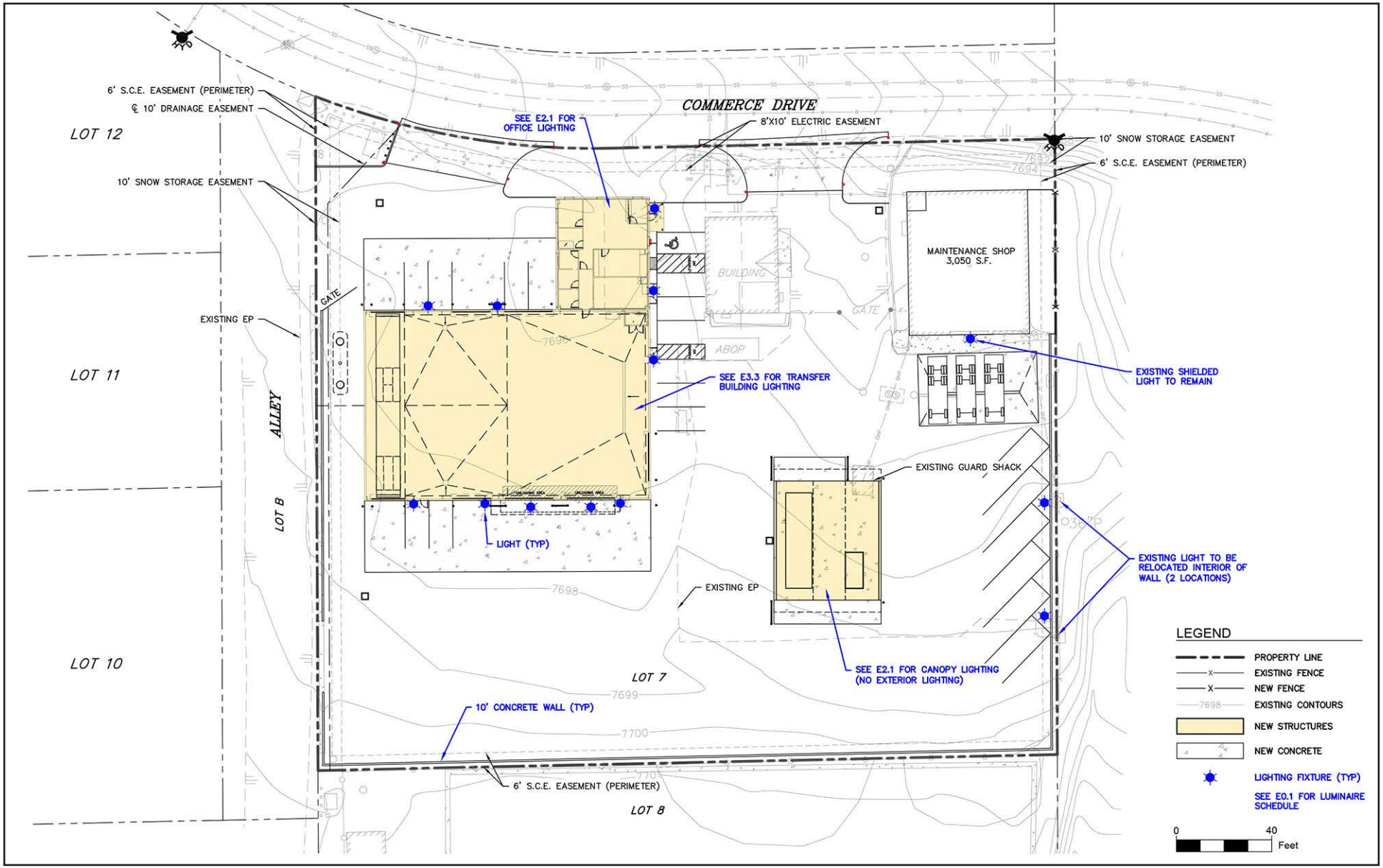
holidays. Thus, construction activities would not occur later than 8:00 p.m. on designated days. Additionally, construction-related nighttime security lighting, if necessary, would be oriented downward and away from adjacent uses. It should also be noted that uses adjacent to the project site are other industrial businesses within the Mammoth Lakes Business Park. The closest sensitive receptors are single-family residences approximately 550 feet south of the 59 Commerce Drive Site and approximately 850 feet south of the 264 Commerce Drive Site, both separated by open space (with mature pine trees) from the project site. Last, sensitive receptors are situated at a higher elevation that the project site and surrounding Mammoth Lakes Business Park. As such, compliance with Municipal Code Section 15.08.020 would reduce the project's construction-related light and glare impacts to less than significant.

Operations

Currently, light and glare sources at the project site include interior lighting and exterior security lighting associated with the existing transfer station facility, buy-back/recycling center, and fleet maintenance facility. Lighting in the surrounding area includes interior lighting and exterior security lighting associated with neighboring industrial uses in the Mammoth Lakes Business Park and single-family residences to the south. Headlights from vehicles traveling along Commerce Drive and Meridian Boulevard also generate sources of light and glare in the area.

Project implementation would not substantially increase lighting at the project site compared to existing conditions given that the transfer station facility, buy-back/recycling center, and fleet maintenance facility are currently operational. New structures proposed on the 59 Commerce Drive Site (i.e., new transfer station building, office building, and scale house) would be installed with new lighting fixtures for interior lighting and exterior security; refer to Exhibit 4.1-1, *Site Lighting Plan*. As shown, exterior light fixtures would be installed along the perimeter of the transfer station building and office building. Additionally, existing exterior lights on the eastern portion of the 59 Commerce Drive Site would remain. The expanded transfer station facility and buy-back/recycling center would both be open from 6:30 a.m. to 9:00 p.m. seven days a week. In accordance with Municipal Code Section 17.36.030, *Exterior Lighting*, the project would be required to ensure all outdoor lighting fixtures are designed, located, installed, aimed downward or toward structures, retrofitted if necessary, and maintained in order to prevent glare, light trespass, and light pollution. Outdoor lighting installations must be designed to avoid harsh contrasts in lighting levels between the project site and the adjacent properties, and fixtures are required to use full cut-off luminaries with the light source downcast and fully shielded with no light emitted above the horizontal plane. An Outdoor Lighting Plan (Exhibit 4.1-1) is required as part of the project's requested Use Permits and the Town would ensure the project complies with Municipal Code Section 17.36.030, *Exterior Lighting*, as part of the project's Major Design Review process. Additionally, as stated, the closest sensitive receptors are single-family residences approximately 550 feet south of the 59 Commerce Drive Site and approximately 850 feet south of the 264 Commerce Drive Site, both separated from the project site by open space (with mature pine trees) and situated at a higher elevation than the project site. Given the existing lighting conditions on-site and in the surrounding Mammoth Lakes Business Park area, compliance with existing Municipal Code regulations would reduce potentially significant impacts to less than significant levels.

Mitigation Measures: No mitigation measures are required.



Source: Lawrence & Associates, 2021.

MAMMOTH DISPOSAL TRANSFER STATION EXPANSION PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Site Lighting Plan

Exhibit 4.1-1

Michael Baker INTERNATIONAL

JN 181877 | 03/21

4.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	**Potentially Significant Impact**	**Less Than Significant Impact With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 122220(g)), timberland as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				✓
d. Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e. Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?				✓

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The project site does not support agricultural use and is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[1] No agricultural resources exist within or adjacent to the project site. Therefore, project implementation would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use and no impacts would occur.

Mitigation Measures: No mitigation measures are required.

[1] California Department of Conservation, *Farmland Mapping and Monitoring Program, California Important Farmland Finder*, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed February 22, 2020.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is located within the Town's Industrial zoning district and is not covered under a Williamson Act contract.[2] Thus, project implementation would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. The Town does not include zoning for forest land, timberland, or timberland production. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)). No impacts would occur.

Mitigation Measures: No mitigation measures are required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. Refer to Response 4.2(c). Project implementation would not result in the loss of forest land or conversion of forest land to non-forest use. No impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. Refer to Responses 4.2(a) and 4.2(c). Project implementation would not result in the conversion of designated farmland or forest land to non-agricultural/non-forest land use. No impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

[2] California Department of Conservation, Division of Land Resource Protection, *State of California Williamson Act Contract Land*, 2017.

4.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?			✓	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard??			✓	
c. Expose sensitive receptors to substantial pollutant concentrations?			✓	
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			✓	

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The project site is located within the Great Basin Valleys Air Basin (Basin), which is governed by the Great Basin Unified Air Pollution Control District (GBUAPCD). The U.S. Environmental Protection Agency (EPA) has classified the Basin as a non-attainment area for the 24-hour particulate matter less than 10 microns (PM_{10}) under the National Ambient Air Quality Standards (NAAQS) in 1987. Additionally, the Basin is designated as a non-attainment area for the state PM_{10} and ozone standards. Pursuant to the Federal Clean Air Act (FCAA), a non-attainment area shall develop a State Implementation Plan (SIP) to demonstrate how the non-attainment area will attain and maintain the NAAQS for PM_{10}. As such, GBUAPCD and the Town adopted the *Air Quality Management Plan* (1990 AQMP) in November 1990 to attain the 24-hour PM_{10} standard.

In 2014, GBUAPCD adopted the *2014 Update to the Air Quality Maintenance Plan and Redesignation Request for the Town of Mammoth Lakes* (2014 AQMP), which was a revision to the 1990 AQMP and included a request of the EPA for redesignation of Mammoth Lakes as in attainment for the PM_{10} national standard. The 2014 AQMP was approved by the EPA and Mammoth Lakes was redesignated a maintenance area in attainment of the PM_{10} National Standard on November 2, 2015.

In the 2014 AQMP, the Town and the GBUAPCD committed to submitting progress reports every third year to track the continuing progress of the PM_{10} maintenance plan. As such, the *Town of Mammoth Lakes Air Quality Management Plan 2014-2016 Triennial Progress Report* (2017 AQMP) was published and adopted in December 2017. The 2017 AQMP includes an update on PM_{10} air quality and an updated peak daily emissions inventory for all sources in the Town's planning area. As discussed in the 2017 AQMP, the Town's air quality trends and emissions analysis continue to demonstrate that the adopted control measures of the 2014 Air Quality Maintenance Plan are sufficient to maintain compliance with the PM_{10} NAAQS.

The modeling analysis included in the 2014 AQMP is based on growth projections and vehicle miles traveled (VMT) from the buildout of the General Plan. The 2014 AQMP estimated 179,708 vehicle miles traveled (VMT) per day at General Plan buildout. The VMT estimate is based on a revised traffic model

for the community that incorporates additional roadway segments and revises VMT projections based on updated traffic counts and current modeling technologies. The air quality modeling shows that this overall level of traffic would not cause an exceedance of the NAAQS.

As discussed in Section 4.11, *Land Use and Planning*, development associated with the proposed project would involve construction of a new transfer station building with attached administrative office and relocating other Mammoth Disposal facilities, and this development would be consistent with what is anticipated in the General Plan and Zoning Code. Therefore, VMT associated with the project has been accounted for in the 2014 AQMP, which utilized the General Plan buildout VMT estimate (179,708 VMT) for air quality modeling. Further, the 2014 AQMP set a threshold of 106,600 VMT on any given day for development projects. Not accounting for VMT reductions from existing conditions, the proposed project would generate 7,190 VMT daily (refer to Appendix A, *Air Quality/Greenhouse Gas/Energy Data*). Further, it is acknowledged that operational vehicles are already on the road (an existing condition). Implementation of the proposed project, would just re-distribute such vehicle trips, resulting in an overall reduction in operational VMT for Mammoth Disposal route trucks and commercial vehicles. As such, the project would not exceed the General Plan buildout VMT threshold identified in the 2014 AQMP.

As the proposed project is accounted for in the General Plan and 2014 AQMP, and the project would not exceed the 2014 AQMP VMT threshold, implementation of the proposed project would not conflict with the 2014 AQMP. A less than significant impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. The GBUAPCD does not currently maintain CEQA significance thresholds for criteria pollutant emissions other than State and Federal standards. Notwithstanding, CEQA allows Lead Agencies to rely on standards or thresholds promulgated by other agencies. As such, this analysis utilizes the numerical standards developed by the Mojave Desert Air Quality Management District (MDAQMD) as the significance thresholds to air quality emissions impacts for the proposed project.[1] Projects in the Basin have recently used the numerical standards of the MDAQMD in prior CEQA reviews (e.g., the *Mammoth Creek Park West New Community Multi-Use Facilities EIR*, dated December 2016). Because the air quality and pollutant attainment status in portions of the Mojave Desert Air Basin (MDAB) are similar to those of the Basin, the MDAQMD numerical thresholds are considered adequate to serve as significance thresholds for the proposed project. Table 4.3-1, *Regional Thresholds of Significance*, presents the MDAQMD criteria pollutant thresholds utilized to determine air emissions impacts for the proposed project.

[1] Telephone conversation with Jan Sudomier from the GBUAPCD, August 27, 2018. As the GBUAPCD has not adopted air quality criteria pollutant thresholds, the Mojave Desert Air Quality Management District thresholds are appropriate for criteria pollutants.

Table 4.3-1
Regional Thresholds of Significance

Phase	Pollutant (pounds/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Construction	137	137	548	137	82	65
Operation	137	137	548	137	82	65

VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter smaller than 10 microns; $PM_{2.5}$ = particulate matter smaller than 2.5 microns

Source: Mojave Desert Air Quality Management District, *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*, August 2016.

Additionally, GBUAPCD has established the following Rules that would be applicable to the proposed project:

- *Rule 401 – Fugitive Dust*. This rule requires reasonable precaution measures to prevent visible particulate matter from being airborne, under normal wind conditions, beyond the source from which the emissions originate.

- *Rule 402 – Nuisance*. This rule prohibits the discharge of air contaminants, from any source, or other materials that cause injury, detriment, nuisance or annoyance to the public.

- *Rule 404-A – Particulate Matter*. This rule regulates the allowable concentration of particulate matter discharged per standard dry cubic foot of exhaust gas. Concentrations may not exceed 0.3 grains per standard dry cubic foot of exhaust gas.

- *Rule 404-B – Oxides of Nitrogen*. This rule regulates the allowable concentration of nitrogen oxides emitted in exhaust fumes to not exceed 250 parts per million by volume.

Short-Term (Construction) Emissions

Construction activities would include demolition, grading, paving, construction, and architectural coating applications at the 59 Commerce Drive Site, and mostly non-structural improvements at the 264 Commerce Drive Site. The duration of construction activities associated with the proposed project is estimated to last approximately 14 months, assuming that construction and improvements at both sites would occur concurrently as a conservative analysis. It is anticipated that approximately 2,000 cubic yards of soil would be exported from the site for off-site disposal.

Exhaust emission factors for typical diesel-powered heavy equipment are based on the California Emissions Estimator Model version 2016.3.2 (CalEEMod) program defaults. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site. The analysis of daily construction emissions has been prepared utilizing CalEEMod. Refer to Appendix A, for the CalEEMod outputs and results. Table 4.3-2, *Maximum Daily Construction Emissions*, presents the anticipated daily short-term construction emissions.

Table 4.3-2
Maximum Daily Construction Emissions

Year	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Year 1 Construction Emissions	32.79	28.42	18.94	0.04	1.65	1.24
Year 2 Construction Emissions	1.72	17.03	12.27	0.03	1.09	0.78
Maximum Construction Emissions	32.79	28.42	18.94	0.04	1.65	1.24
Significance Thresholds	*137*	*137*	*548*	*137*	*82*	*65*
Is Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

VOC=volatile organic compound; NO_X=nitrogen oxides; CO=carbon monoxide; SO_X=sulfur oxides; PM_{10}=respirable particulate matter 10 microns or less in diameter; $PM_{2.5}$=fine particulate matter 2.5 microns or less in diameter.

Notes:
1. Emissions were calculated using California Emissions Estimator Model (CalEEMod).
2. The reduction/credits for construction emission mitigations are based on mitigation included in CalEEMod. The mitigation includes the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces twice daily; cover stock piles with tarps; water all haul roads twice daily; limit speeds on unpaved roads to 15 miles per hour; and use CARB certified engines.
3. Regional daily construction thresholds are based on the MDAQMD significance thresholds.

Source: Refer to Appendix A, *Air Quality/Greenhouse Gas/Energy Data*, for detailed model input/output data.

As indicated in Table 4.3-2, construction emissions would not exceed the applicable MDAQMD significance thresholds. Notwithstanding, the project would be required to comply with GBUAPCD Rules 401 and 402. GBUAPCD Rule 401, *Fugitive Dust*, requires the employment of all reasonable precautions (e.g., use of water or chemicals for control of dust) to be taken to precent visible particulate matter from being airborne. GBUAPCD Rule 402, *Nuisance*, prohibits the discharge of air contaminants or other materials that may cause injury, detriment, nuisance or annoyance to any persons. Based on Table 4.3-2 and with compliance of all applicable GBUAPCD Rules, the project would result in less than significant construction-related emissions impacts.

Long-Term (Operational) Emissions

Operational emissions generated by both stationary and mobile sources would result from normal daily activities on the project site (i.e., increased concentrations of ROG, NO_X, SO_X, PM_{10}, and CO). It should be noted that the project would not consume natural gas as all of the Town uses propane to fuel furnaces, water heaters, stoves, etc. Mobile source emissions would be generated by the motor vehicles traveling to and from the project site. Stationary area source emissions would be generated by consumption of propane for space and water heating devices, operation of landscape maintenance equipment, potential machinery, and use of consumer products. Energy emissions would result from propane consumption associated with the project. Analysis of mobile emissions is based primarily upon the *Mammoth Disposal Transportation Analysis* (Transportation Analysis) prepared by LSC Transportation Consultants, dated April 1, 2021. The analysis of daily operational emissions has been prepared utilizing CalEEMod. CalEEMod model runs were conducted for both the existing conditions and the proposed project; refer to Appendix A. Further, vehicle emission factors were taken from CARB's 2017 EMission FACtor (EMFAC2017) model.

Existing Operational Emissions

The existing project site is broken down into uses at two separate sites: 59 Commerce Drive and 264 Commerce Drive. Existing structures on the 59 Commerce Drive Site include a 1,200-square foot office building, guard/attendant shed, outdoor transfer station (primarily consisting of bins and containers), 3,050-square foot buy-back/recycling center building, and an outdoor bin storage area. The 264 Commerce Drive Site is currently developed with a 6,800-square foot vehicular fleet maintenance building and a paved area utilized for truck (fleet) parking. A CalEEMod model run was conducted to quantify operational emissions from the existing project site; refer to Table 4.3-3, *Existing Operational Air Emissions*. Trip generation rates associated with the existing uses were based on the Transportation Analysis. According to the Transportation Analysis, the existing project site generates approximately 504 mobile daily trips.

Table 4.3-3
Existing Operational Air Emissions

Emissions Source	Pollutant (pounds per day)[1,2]					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	0.33	<0.01	0.01	<0.01	<0.01	<0.01
Energy	<0.01	0.02	0.01	<0.01	<0.01	<0.01
Mobile	2.24	4.71	14.63	0.05	3.85	1.07
Total Existing Emissions[2]	**2.58**	**4.72**	**14.64**	**0.05**	**3.85**	**1.07**

Notes:
VOC=volatile organic compound; NO_X=nitrogen oxides; CO=carbon monoxide; SO_X=sulfur oxides; PM_{10}=respirable particulate matter 10 microns or less in diameter; $PM_{2.5}$=fine particulate matter 2.5 microns or less in diameter.
1. Based on CalEEMod results, worst-case seasonal emissions have been modeled.
2. Some totals do not add due to rounding.

Source: Refer to Appendix A, *Air Quality/Greenhouse Gas/Energy Data*, for detailed model input/output data.

Project Operational Emissions

The project proposes to 1) expand the existing transfer station at the 59 Commerce Drive Site, 2) relocate the buy-back/recycling center (currently at the 59 Commerce Drive Site) to the 264 Commerce Drive Site, and 3) relocate the fleet maintenance operations (currently at the 264 Commerce Drive Site) to the 59 Commerce Drive Site. Specifically, improvements at the 59 Commerce Drive Site would include: construction of a 9,600-square foot transfer station building; replacement of the guard/attendant shed with a pre-manufactured scale house; installation of truck scales near the proposed scale house; installation of a 2,250-square foot metal canopy structure over the proposed truck scales and scale house; construction of a new approximately 1,855-square foot office building; and repurposing of the existing 3,050-square foot buy-back/recycling center building with the relocated fleet maintenance facility from the 264 Commerce Drive Site.

Table 4.3-4, *Long-Term Net Operational Air Emissions*, presents the anticipated net project operational emissions compared to the existing use. The net operational emissions were calculated by subtracting the existing use emissions from the proposed project emissions. Project operational emissions were calculated using CalEEMod and an EMFAC2017. The proposed project would include operational emission reductions from the most current Building Energy Efficiency Standards - Title 24 and the

California Green Building Standards Code (CALGreen), including installation of energy efficient windows, insulation, lighting, ventilation systems, as well as water efficient fixtures. As indicated in Table 4.3-4, the project's net operational emissions would be less than the MDAQMD CEQA significance thresholds for all criteria pollutants and impacts would be less than significant.

Table 4.3-4
Long-Term Net Operational Air Emissions

Emissions Source	Pollutant (pounds per day)[1,2]					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	0.64	0.00	0.01	0.00	0.00	0.00
Energy	0.00	0.02	0.02	0.00	0.00	0.00
Mobile	3.09	6.80	21.08	0.07	5.66	1.57
Project Maximum Daily Emissions[2]	*3.73*	*6.82*	*21.11*	*0.07*	*5.67*	*1.57*
Existing Maximum Daily Emissions[2]	*2.58*	*4.72*	*14.64*	*0.05*	*3.85*	*1.07*
Net Total Project Maximum Daily Emissions[3]	***1.15***	***2.10***	***6.47***	***0.02***	***1.81***	***0.50***
Significance Threshold	*137*	*137*	*548*	*137*	*82*	*82*
Is Thresholds Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes:
VOC=volatile organic compound; NO_x=nitrogen oxides; CO=carbon monoxide; SO_X=sulfur oxides; PM_{10}=respirable particulate matter 10 microns or less in diameter; $PM_{2.5}$=fine particulate matter 2.5 microns or less in diameter.
1. Based on CalEEMod results, worst-case seasonal emissions for area and mobile emissions have been modeled.
2. Some totals do not add due to rounding.

Source: Refer to Appendix A, *Air Quality/Greenhouse Gas/Energy Data*, for detailed model input/output data.

Further, municipal solid waste from the Town of Mammoth Lakes and surrounding communities is currently disposed of at the Benton Crossing Landfill, located in unincorporated Mono County approximately 9.5 miles northeast of the Town, either directly by individual patrons or via Mammoth Disposal route trucks. As the Benton Crossing Landfill is anticipated to reach capacity and will stop receiving waste by January 1, 2023, such municipal solid waste will have to be transported to other landfill facilities located further from waste source locations (refer to Exhibit 2-1, *Regional Vicinity*).

The purpose of the proposed project is to increase handling volume capacity for municipal solid waste at the existing Town of Mammoth Lakes Mammoth Disposal Transfer Station such that individual patrons and route trucks from Mammoth Lakes and the surrounding community can dispose of waste at the transfer station (closer to the waste source locations). The municipal solid waste would then be sorted, compacted, and consolidated at the transfer station into haul trucks (larger than the facility is currently capable of handling) for transporting to an off-site landfill facility in lieu of individual patron or route truck trips, thus resulting in fewer VMT for trips accessing the surrounding vicinity.

Air Quality Health Impacts

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age, gender]). In particular, ozone precursors ROGs and NO_x affect air quality on a regional scale. Health effects related to ozone are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the project's less than significant increases in regional air pollution from criteria air pollutants would have nominal or negligible impacts on human health.

As noted in the Brief of Amicus Curiae by the South Coast Air Quality Management District (SCAQMD),[2] the SCAQMD acknowledged that it would be extremely difficult, if not impossible to quantify health impacts of criteria pollutants for various reasons including modeling limitations as well as where in the atmosphere air pollutants interact and form. Further, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (SJVAPCD),[3] SJVAPCD has acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.

The SCAQMD acknowledges that health effects quantification from ozone, as an example is correlated with the increases in ambient level of ozone in the air (concentration) that an individual person breathes. SCAQMD's Brief of Amicus Curiae states that it would take a large amount of additional emissions to cause a modeled increase in ambient ozone levels over the entire region. The SCAQMD states that based on their own modeling in the SCAQMD's *2012 Air Quality Management Plan*, a reduction of 432 tons (864,000 pounds) per day of NO_X and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce ozone levels at highest monitored site by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify ozone-related health impacts caused by NO_X or VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations. As such, for the purpose of this analysis, since the project would not exceed MDAQMD thresholds for construction and operational air emissions, the project would have a less than significant impact for air quality health impacts.

Mitigation Measures: No mitigation measures are required.

[2] South Coast Air Quality Management District, *Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno*, 2014.

[3] San Joaquin Valley Air Pollution Control District, *Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno*, 2014.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. The CARB has identified the following groups of individuals as those most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis.

As discussed previously, the proposed project would result in minor operational and construction-related emissions. Construction and operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant. The proposed project would cause short-term air quality impacts in the vicinity of the project site as a result of construction activities, including fugitive dust. However, construction and operation of the proposed project would not result in long-term or cumulatively considerable increases in air pollution emissions for which the Basin is currently in Federal non-attainment (PM_{10}).[4]

Construction Activities

Construction activities associated with the proposed project would result in less than significant construction-related air quality impacts, as quantified above in Table 4.3-1.

The GBUAPCD has developed a permitting process prior to the construction of any development within the GBUAPCD to ensure that construction activities would not result in exceedances of NAAQS. The GBUAPCD emphasizes the use of control measures during construction activities. As stated in Response 4.3(b), GBUAPCD Rules 401 and 402 would reduce impacts associated with project construction. GBUAPCD Rule 401, *Fugitive Dust*, requires the employment of all reasonable precautions (e.g., use of water or chemicals for control of dust) to be taken to prevent visible particulate matter from being airborne. GBUAPCD Rule 402, *Nuisance*, prohibits the discharge of air contaminants or other materials that may cause injury, detriment, nuisance or annoyance to any persons. The project would comply with all applicable GBUAPCD Rules and the project's cumulative contribution would be less than significant in this regard.

Operational Activities

As shown in Table 4.3-3, operational emissions for all criteria pollutants would be below the MDAQMD significance thresholds. Therefore, the project would not contribute to a cumulatively considerable net increase of any criteria pollutant for which the GBUAPCD is in nonattainment. Emissions of nonattainment pollutants or their precursors would not be cumulatively considerable and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

[4] Although the Town is designated as a maintenance area in attainment of the PM_{10} NAAQS, the project's construction and operational air emissions were compared against regional daily thresholds; refer to Table 4.3-2 and Table 4.3-4. Therefore, the Basin's attainment status was used in this scenario.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. Construction activities associated with the proposed project may generate detectable odors from heavy-duty equipment exhaust. However, construction-related odors would be intermittent, short-term in nature, and cease upon project completion. In addition, the project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by requiring equipment to be shut off when not in use or limiting idling time to no more than five minutes. Compliance with these existing regulations would further reduce the detectable odors from heavy-duty equipment exhaust.

Operations associated with municipal solid waste handling have the potential to generate detectable odors. The proposed transfer station building would receive municipal solid waste, construction and demolition debris, and wood waste and green waste debris. Waste would be dumped to the tipping floor on-site and then moved directly to large haul trucks for transport. Although the project would be permitted to receive an increased quantity of waste when compared to existing conditions, all municipal solid waste would be removed within 72 hours of receipt to minimize odors. Additionally, operations at the proposed transfer station would be contained within the transfer station building and would include a misting system to control dust and minimize odors. Therefore, odors would be reduced when compared to existing conditions as the existing transfer station operations occur outside and are not enclosed within a building. Thus, the project would not result in other emissions (such as those leading to odors) that could adversely affect a substantial number of people. A less than significant impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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4.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				✓
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				✓
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				✓
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The project site is fully disturbed, graded, and situated within an urbanized and industrial portion of the Town; refer to Exhibit 2-2, *Site Vicinity*. An existing solid waste transfer station and buy-back/recycling center operate at the 59 Commerce Drive Site and a fleet maintenance facility operates at the 264 Commerce Drive Site. There is no native vegetation on-site that could have the capacity to support sensitive biological resources. Based on the site's disturbed condition, project implementation would not adversely impact any species identified as candidate, sensitive, or special status. No impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. Riparian habitats are those occurring along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, known to provide habitat for sensitive animal or plant species, or known to be important wildlife corridors.

The project site is disturbed and built out, and is located in the Mammoth Lakes Business Park. There is no riparian habitat or other sensitive natural communities present on the project site or in the vicinity. Thus, project implementation would not significantly impact any riparian habitat or other sensitive natural community. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

c) Have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Wetlands are defined under the Federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs.

There are no Federally protected wetlands present on the project site. According to the U.S. Fish and Wildlife Service National Wetlands Inventory, the closest wetland habitat is an unnamed drainage located approximately 0.25-mile to the north of the project site across State Route 203.[1] Thus, project implementation would not impact Federally protected wetlands through direct removal, filling, hydrological interruption, or other means.

Mitigation Measures: No mitigation measures are required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. The project site is not located within any local or regional designated migratory corridors or linkages. As stated, the site is urbanized and surrounded by other industrial businesses within the Mammoth Lakes Business Park; refer to Exhibit 2-2. As such, development of the proposed project is not expected to disrupt wildlife movement opportunities within or adjacent to the site. It should be noted that Mammoth Creek is located approximately two miles to the south of the project site and provides wildlife movement opportunities along the riparian corridor from the mountains to the valley floor. However, the proposed project would not result in impacts to Mammoth Creek and would not be expected

[1] U.S. Fish and Wildlife Services, *National Wetlands Inventory*, https://www.fws.gov/wetlands/Data/Mapper.html, accessed February 1, 2021.

to disrupt wildlife movement within undeveloped areas to the south or prevent the creek from continuing to function as a wildlife movement corridor. As such, no impact to habitat linkages and wildlife corridors would occur.

Mitigation Measures: No mitigation measures are required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. *Town of Mammoth Lakes Municipal Code* (Municipal Code) Section 17.36.140 provides provisions to protect and regulate the removal of certain trees, based on the important environmental, aesthetic, and health benefits that trees provide to the Town residents and visitors, and the contribution of such benefits to public health, safety, and welfare. These benefits include, but are not limited to, enhancement of the character and beauty of the community as a "Village in the Trees," protection of property values, provision of wildlife habitat, reduction of soil erosion, noise buffering, wind protection, and visual screening for development. Municipal Code Section 17.36.140 applies to all private and public property within the Town.

There are no existing trees within the project site. Thus, project development would not require the removal of any trees protected under Municipal Code Section 17.36.140. No impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The project site and surrounding vicinity are not located within an area covered by a Habitat Conservation Plan or Natural Community Conservation Plan.[2] No other approved local, regional, or State habitat conversation plans apply to the project site. As such, no impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

[2] California Department of Fish and Wildlife, *California Natural Community Conservation Plans*, April 2019, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed February 1, 2021.

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4.5 CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5?				✓
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?		✓		
c. Disturb any human remains, including those interred outside of formal cemeteries?			✓	

This section is based on the *Cultural Resources Identification Report for the Mammoth Disposal Waste Transfer Station Project, Mammoth Lakes, Mono County, California* (Cultural Report), prepared by Michael Baker International, dated April 22, 2021; refer to Appendix B, *Cultural Resources Report*.

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

***No Impact*.** A records search was conducted at the Eastern Information Center (EIC) on February 8, 2021. The EIC, as part of the California Historical Resources Information System (CHRIS), California State University, Riverside, an affiliate of the California Office of Historic Preservation (OHP), is the official state repository of cultural resources records and reports for Mono County. The search included a review of the California Register of Historical Resources (CRHR); the California Points of Historical Interest, California Historical Landmarks, and Archaeological Determinations of Eligibility lists; and the Built Environmental Resource Database (which includes resources evaluated for listing and listed in the National Register of Historic Places [NRHP], National Historic Landmarks, CRHR, California Historical Landmarks, and California Points of Historical Interest for Mono County). The search was conducted to identify previously recorded cultural resources and previous cultural resources studies within a 0.25-mile radius of the project site (including both the 59 Commerce Drive Site [APNs 037-200-049 and 037-200-050] and the 264 Commerce Drive Site [APN 037-200-061]). The two sites are referenced together as "project site" or individually as "59 Commerce Drive Site" and "264 Commerce Drive Site"; refer to Exhibit 2-2, *Site Vicinity*.

According to the Cultural Report, the records search identified 20 previously conducted cultural resources studies within the 0.25-mile search radius, three of which included the project site. Five previously recorded cultural resources were identified within a 0.25-mile radius of the project site, none of which are located within the project site; refer to Appendix B. One of the five previously recorded cultural resources within a 0.25-mile radius of the project site is immediately adjacent (P-26-001654/CA-MNO-1654) to the 59 Commerce Drive Site. Resource P-26-001654/CA-MNO-1654 was evaluated for the NRHP and was found ineligible as a historical resource. Further, a pedestrian survey of the project site was conducted on February 9, 2021. The project site was snow-covered and was landscaped cement or gravel parking lots. Soils were rarely exposed with less than 5 percent surface visibility in the project site. All observed soil and gravel were fill. No cultural resources were observed during the survey.

As such, the project site does not support historical resources pursuant to CEQA and development of the proposed project would not adversely impact historic resources. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less Than Significant Impact With Mitigation Incorporated. As discussed in Response 4.5(a), no cultural resources, including archeological resources, are located within the project site. However, one archaeological resource (P-26-001654/CA-MNO-1654) was documented adjacent to the 59 Commerce Drive Site. Furthermore, an additional four prehistoric sites have been previously recorded within proximity of the project area. As such, both the 59 Commerce Drive Site and 264 Commerce Drive Site have sensitivity for buried archaeological resources. As such, the project site is sensitive for possible buried prehistoric period archaeological resources and potentially significant cultural deposits may exist beneath the project site. Development of the proposed project would require excavation activities as deep as approximately eight feet below ground surface. As such, Mitigation Measure CUL-1 requires the preparation and implementation of a Workers Environmental Awareness Program training prior to project commencement. Mitigation Measure CUL-2 requires archaeological and Native American monitoring during initial ground disturbances associated with the project and/or until the monitor determines that monitoring is no longer necessary. Mitigation Measure CUL-2 also requires all construction work to halt if cultural resources are encountered during ground disturbing activities until a qualified archaeologist can evaluate the find. Implementation of Mitigation Measures CUL-1 and CUL-2 would ensure impacts to potentially significant archaeological resources are reduced to less than significant levels.

Mitigation Measures:

CUL-1 **Workers Environmental Awareness Program.** Prior to ground disturbing activities, the Project Applicant shall prepare and implement a Workers Environmental Awareness Program (WEAP) training to address cultural resources issues anticipated at the project site for review and approval by the Public Works Director. The WEAP shall include information of the laws and regulations that protect cultural resources, the penalties for a disregard of those laws and regulations, what to do if cultural resources are unexpectedly uncovered during construction, and contact information for a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, who shall be contacted in the case of unanticipated discoveries. The WEAP shall also include project specific information regarding the potential for and types of prehistoric and historic resources that may potentially be encountered.

CUL-2 **Archaeological and Native American Monitoring.** A qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, and qualified Native American monitor shall be retained to perform all mitigation measures related to prehistoric and historic cultural and tribal cultural

resources for the project. An archaeologist and Native American monitor shall be present to monitor all initial ground disturbing activities associated with the project, including but not limited to: removal of building asphalt, pot-holing or auguring, grubbing, weed abatement, boring/grading of soils, drilling/trenching for utilities, excavations associated with development, etc. The monitors shall complete monitoring logs on a daily basis. The logs shall provide descriptions of the daily activities, including construction activities, locations, soil, and any cultural materials identified. In addition, the monitors are required to provide insurance certificates, including liability insurance, for any archaeological resource(s) encountered during grading and excavation activities pertinent to the provisions outlined in the California Environmental Quality Act, California Public Resources Code Division 13, Section 21083.2 (a) through (k).

If, during initial ground disturbance, the monitors determine that the ground disturbing activities have little or no potential to impact cultural resources, and/or the monitors determine that ground disturbances would occur within previously disturbed and non-native soils, the qualified archaeologist may recommend that monitoring may be reduced or eliminated. This decision shall be made in consultation with the Native American monitor and the Town of Mammoth Lakes. The final decision to reduce or eliminate monitoring shall be at the discretion of the Town of Mammoth Lakes. If cultural resources are encountered during ground disturbing activities, work in the immediate area shall halt, the qualified archaeologist shall immediately notify the Public Works Director, and the find shall be evaluated for significance under the California Environmental Quality Act and National Historic Preservation Act (NHPA). Consultation with the Native American monitor, the Native American Heritage Commission, and data/artifact recovery, if deemed appropriate, shall be conducted. The qualified archaeologist and monitors may reduce or stop monitoring dependent upon observed conditions.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. Although no conditions exist that suggest human remains are likely to be found on the project site, development of the project site could result in the discovery of human remains and potential impacts to these resources. If human remains are found, those remains would be required to conduct proper treatment, in accordance with applicable laws. Health and Safety Code Sections 7050.5 to 7055 describe the general provisions for human remains. Specifically, Health and Safety Code Section 7050.5 describes the requirements if any human remains are accidentally discovered during excavation of a site. As required by State law, the requirements and procedures set forth in Public Resources Code Section 5097.98 would be implemented, including notification of the County Coroner, notification of the Native American Heritage Commission (NAHC) and consultation with the individual identified by the NAHC to be the "most likely descendant (MLD)." The MLD would have 48 hours to make recommendations to landowners for the disposition of any Native American human remains and grave goods found. If human remains are found during excavation, excavation must stop in the vicinity of the find and any area that is reasonably suspected to overlay adjacent remains until the County coroner has been called out, and the remains have been investigated and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with existing State regulations, which detail the appropriate actions necessary in the event human remains are encountered, impacts in this regard would be reduced to less than significant levels.

Mitigation Measures: No mitigation measures are required.

4.6 ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			✓	
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			✓	

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
Less Than Significant Impact.

Regulatory Framework

California Building Energy Efficiency Standards (Title 24)

The 2019 California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2020. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Under 2019 Title 24 standards, residential buildings would use about 53 percent less energy (mainly due to solar photovoltaic panels and lighting upgrades) when compared to those constructed under 2016 Title 24 standards, and nonresidential buildings would be 30 percent more energy efficient than 2016 Title 24 standards.[1] The 2019 Title 24 standards require installation of energy efficient windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

California Green Building Standards (CALGreen)

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as CALGreen, is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development in an effort to meet the State's landmark initiative Assembly Bill (AB) 32 goals, which established a comprehensive program of cost-effective reductions of greenhouse gas (GHG) emissions to 1990 levels by 2020. CALGreen was developed to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, and healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration. California Code of Regulations Title 24 Parts 6 and 11 together comprise the Building Energy Efficiency Standards. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt which

[1] California Energy Commission, *2019 Building Energy Efficiency Standards*, March 2018.

encourage or require additional measures in the five green building topics. Specifically, CALGreen requires new buildings to reduce water consumption by 20 percent, divert 50 percent of construction waste from landfills, and install low pollutant-emitting materials. The most recent update to the CALGreen Code was adopted in 2019 and became effective on January 1, 2020.

California Public Utilities Commission Energy Efficiency Strategic Plan

The California Public Utilities Commission (CPUC) prepared an Energy Efficiency Strategic Plan (Strategic Plan) in September 2008 with the goal of promoting energy efficiency and a reduction in greenhouse gases. In January 2011, a lighting chapter was adopted and added to the Strategic Plan. The Strategic Plan is California's single roadmap to achieving maximum energy savings in the State between 2009 and 2020, and beyond 2020. The Strategic Plan contains the practical strategies and actions to attain significant statewide energy savings, as a result of a year-long collaboration by energy experts, utilities, businesses, consumer groups, and governmental organizations in California, throughout the West, nationally and internationally. The plan includes the four big bold strategies:

1. All new residential construction in California will be zero net energy by 2020.
2. All new commercial construction in California will be zero net energy by 2030.
3. Heating, ventilation and air condition (HVAC) will be transformed to ensure that its energy performance is optimal for California's climate.
4. All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

California Energy Commission Integrated Energy Policy Report

In 2002, the California State legislature adopted Senate Bill (SB) 1389, which requires the California Energy Commission (CEC) to develop an Integrated Energy Policy Report (IEPR) every two years. SB 1389 requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices, and use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the State's economy, and protect public health and safety.

The CEC adopted the *2019 Integrated Energy Policy Report* (2019 IEPR) on February 20, 2020. The 2019 IEPR provides the results of the CEC's assessments of a variety of energy issues facing California and covers a broad range of topics, including implementation of SB 100 (statewide greenhouse gas reduction targets), integrated resource planning, distributed energy resources, transportation electrification, solutions to increase resiliency in the electricity sector, energy efficiency, barriers faced by disadvantaged communities, demand response, transmission, landscape-scale planning, electricity and natural gas demand forecast, transportation energy demand forecast, renewable gas, updates on Southern California's electricity reliability, natural gas outlook, and climate adaptation and resiliency.

Methodology

This analysis focuses on three sources of energy that are relevant to the proposed project: electricity, propane, and transportation fuel for vehicle trips associated with new development and for project construction. It should be noted that the project would not consume natural gas as all of the Town uses propane to fuel furnaces, water heaters, stoves, etc. The analysis of operational electricity/propane usage is based on the California Emissions Estimator Model version 2016.3.2 (CalEEMod) modeling results for the project, which quantifies energy use for occupancy. The project's estimated electricity/

propane consumption is based primarily on CalEEMod's default settings for Mono County, and consumption factors provided by Southern California Edison (SCE) and AmeriGas (the electricity and propane providers for the project site).[2] The results of the CalEEMod modeling are included in Appendix A, *Air Quality/GHG/Energy Data*. The amount of operational fuel consumption was estimated using the California Air Resources Board's Emissions Factor 2017 (EMFAC2017) computer program which provides projections for typical daily fuel usage in Mono County, and the project's annual vehicle miles traveled (VMT) outputs from CalEEMod. The estimated construction fuel consumption is based on the project's construction equipment list timing/phasing, and hours of duration for construction equipment.

CEQA Guidelines Appendix F is an advisory document that assists in determining whether a project would result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis on Response VI(a) relies upon Appendix F of the CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

Criterion 1: The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed.

Criterion 2: The effects of the project on local and regional energy supplies and on requirements for additional capacity.

Criterion 3: The effects of the project on peak and base period demands for electricity and other forms of energy.

Criterion 4: The degree to which the project complies with existing energy standards.

Criterion 5: The effects of the project on energy resources.

Criterion 6: The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Quantification of the project's energy usage is presented and addresses Criterion 1. The discussion on construction-related energy use focuses on Criteria 2, 4, and 5. The discussion on operational energy use is divided into transportation energy demand and building energy demand. The transportation energy demand analysis discusses Criteria 2, 4, and 6, and the building energy demand analysis discusses Criteria 2, 3, 4, and 5.

Project-Related Sources of Energy Consumption

The project's estimated net energy consumption (project minus existing) is summarized in Table 4.6-1, *Net Energy Consumption*. As shown in Table 4.6-1, the project's net electricity usage would constitute an approximate 0.00003 percent increase over Mono County's typical annual electricity. The project would increase net propane consumption by approximately 16,962 kilo-British thermal unit (kBTU), when compared to existing conditions. The project's construction and net operational vehicle fuel consumption would increase Mono County's consumption by 0.008 percent and 0.3 percent, respectively (**Criterion 1**).

[2] At the time of this analysis, energy consumption values were not available at the local (i.e. Town) level. Additionally, CalEEMod does not contain default data at the local (i.e. Town) level. As such, Mono County data was used for the purpose of this analysis.

Table 4.6-1
Net Energy Consumption

Energy Type	Net Project Annual Energy Consumption[1]	Mono County Annual Energy Consumption[2]	Percentage Increase Countywide[2]
Electricity Consumption	55 MWh	205,216,773 MWh	0.00003 %
Propane Consumption[3]	16,962 kBTU	N/A	N/A
Fuel Consumption			
• Construction (Heavy-Duty Diesel Vehicle) Fuel Consumption[4]	25,932 gallons	3,387,178 gallons	0.008 %
• Operational Automotive Fuel Consumption[4,5]	52,492 gallons	17,089,930 gallons	0.3 %

Notes: MWh = megawatt-hour ; kBTU = kilo-British thermal unit; NA = not available

1. As modeled in CalEEMod version 2016.3.2.
2. The project increases in electricity consumption is compared to the total consumption in Mono County in 2019. The project increases in fuel consumption are compared with the projected Countywide fuel consumption in 2021 (construction) and 2022 (operational).
   Mono County electricity consumption data source: California Energy Commission, *Electricity Consumption by County*, http://www.ecdms.energy.ca.gov/elecbycounty.aspx, accessed March 8, 2021.
3. Mono County's quantified propane consumption is not available at the time of this writing.
4. Project fuel consumption calculated based on CalEEMod results. Countywide fuel consumption is based on the California Air Resources Board EMFAC2017 model.
5. Operational fuel consumption is based on the net difference between the proposed project and existing conditions at the project site location and does not include fuel considerations (and reductions) associated with former VMT to Benton Crossing Landfill by route trucks and public vehicles that would be received at the Benton Crossing Landfill.

Refer to Appendix A, *Air Quality/GHG/Energy Data*, for assumptions used in this analysis.

Construction-Related Energy Consumption

During construction, the project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels for construction vehicles and other energy-consuming equipment would be used during demolition, grading, building construction, paving, and architectural coatings. As indicated in Table 4.6-1, the overall fuel consumption during project construction would be 25,932 gallons, which would result in a nominal increase (0.008 percent) in fuel use in the County. As such, project construction would have a minimal effect on the local and regional energy supplies and would not require additional capacity (**Criterion 2**).

Some incidental energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest U.S. Environmental Protection Agency (EPA) and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Furthermore, because the cost of fuel and transportation is a significant aspect of construction budgets, contractors and owners usually have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (**Criterion 4**).

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than nonrecycled materials.[3] It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual project characteristics that would necessitate the use of construction equipment or building materials, or methods that would be less energy efficient than at comparable construction sites in the region or State. Therefore, fuel energy and construction materials consumed during construction would not represent a significant demand on energy resources (**Criterion 5**).

Therefore, construction energy use would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. A less than significant impact would occur in this regard.

Operational Energy Consumption

The project proposes to 1) expand the existing transfer station at the 59 Commerce Drive Site, 2) relocate the buy-back/recycling center (currently at the 59 Commerce Drive Site) to the 264 Commerce Drive Site, and 3) relocate the fleet maintenance operations (currently at the 264 Commerce Drive Site) to the 59 Commerce Drive Site. Specifically, improvements at the 59 Commerce Drive Site would include: construction of a 9,600-square foot transfer station building; replacement of the guard/attendant shed with a pre-manufactured scale house; installation of truck scales near the proposed scale house; installation of a 2,250-square foot metal canopy structure over the proposed truck scales and scale house; construction of a new approximately 1,855-square foot office building; and repurposing of the existing 3,050-square foot buy-back/recycling center building with the relocated fleet maintenance facility from the 264 Commerce Drive Site. The net operational energy consumption was calculated by subtracting the existing energy consumption from the proposed project consumption.

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with Federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. Table 4.6-1 provides an estimate of the daily fuel consumed by vehicles traveling to and from the project site. The proposed project is forecast to generate approximately a net increase of 188 daily trips compared to the existing conditions (which currently generates 504 daily trips); refer to Appendix F, *Transportation Analysis*. As demonstrated in Table 4.6-1, the net increased daily trips and the associated fuel consumption would account for a nominal increase (0.3 percent) in the County's fuel consumption.

Further, municipal solid waste from the Town of Mammoth Lakes and surrounding communities is currently disposed of at the Benton Crossing Landfill, located in unincorporated Mono County approximately 9.5 miles northeast of the Town, either directly by individual patrons or via Mammoth Disposal route trucks. As the Benton Crossing Landfill is anticipated to reach capacity and will stop

[3] California Department of Resources Recycling and Recovery, *Green Building Materials*, https://www.calrecycle.ca.gov/greenbuilding/materials#Material, accessed February 17, 2021.

receiving waste by January 1, 2023, such municipal solid waste will have to be transported to other landfill facilities located further from waste source locations (refer to Exhibit 2-1, *Regional Vicinity*).

The purpose of the proposed project is to increase handling volume capacity for municipal solid waste at the existing Town of Mammoth Lakes Mammoth Disposal Transfer Station such that individual patrons and route trucks from Mammoth Lakes and the surrounding community can dispose of waste at the transfer station (closer to the waste source locations). The municipal solid waste would then be sorted, compacted, and consolidated at the transfer station into haul trucks (larger than the facility is currently capable of handling) for transporting to an off-site landfill facility in lieu of individual patron or route truck trips, thus resulting in fewer VMT for trips accessing the surrounding vicinity. As such, the project does not propose any features or uses that would result in excessive long-term operational fuel consumption (**Criterion 2**).

The key drivers of transportation-related fuel consumption are job locations/commuting distance and many personal choices on when and where to drive for various purposes. Those factors are outside of the scope of the design of the proposed project. The project site is located within 0.5-mile of three Eastern Sierra Transit bus stops (purple line) along Meridian Boulevard and College Parkway to the south. There are also existing Class I multi-use paths for pedestrians and bike users in the vicinity, while Class II bike lanes are planned along Meridian Boulevard to the south of the project site.[4] Thus, the project's location would serve to reduce passenger VMT and associated transportation-related fuel consumption (**Criterion 4** and **Criterion 6**).

Therefore, fuel consumption associated with vehicle trips generated by the project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Building Energy Demand

The CEC developed 2018 to 2030 forecasts for energy consumption and peak demand in support of the 2017 IEPR for each of the major electricity planning areas and the State based on the economic and demographic growth projections. CEC forecasted the Statewide electricity demand would range between 325,600 MWh to 356,400 MWh.[5] As shown in Table 4.6-1, the proposed project would be expected to demand approximately 55 MWh of electricity per year, which would be significantly below CEC's Statewide forecasts, as well as the current Countywide usage. Therefore, the project would be consistent with the CEC's energy consumption forecasts and more energy efficient than the County average. Further, the project would increase propane consumption by approximately 16,962 kBTU. The project is estimated to consume approximately 16,962 kBTU of propane, which would be equivalent to approximately three propane tanks. As such, the project's energy consumption would have a minimal effect on the local and regional energy supplies and would not require additional capacity (**Criterion 2**). Further, the project proposes to expand the existing transfer station, relocate the buy-back/recycling center, and relocate the fleet maintenance operations, similar to existing industrial uses near the project site. As such, the project would consume energy during the same time periods as other commercial developments and would not result in unique or more intensive peak or base period electricity demand (**Criterion 3**).

[4] Town of Mammoth Lakes, *General Bikeway Plan*, page 59, March 15, 2014.

[5] California Energy Commission, *California Energy Demand 2018-2030 Revised Forecast*, https://efiling.energy.ca.gov/getdocument.aspx?tn=223244, February 2018. Electricity demand is calculated from the electricity per capita demand from Figure 3 and the Statewide population forecast (approximately 44,000) estimated from Figure 13.

The proposed project would be required to comply with 2019 Title 24 Building Energy Efficiency Standards. Specifically, the project proposes high efficiency lighting which would be 15 percent over Title 24 Standards. Implementation of the 2019 Title 24 standards significantly reduces energy usage (30 percent for nonresidential uses compared to the 2016 standards). The Title 24 Building Energy Efficiency Standards are updated every 3 years and become more stringent between each update, therefore, complying with the latest 2019 Title 24 standards would make the proposed project more energy efficient than existing shopping center built prior to Title 24 standards (**Criterion 4**).

Furthermore, the electricity provider, SCE, is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 60 percent of total procurement by 2030. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance on such energy resources further ensures that new development projects would not result in the waste of the finite energy resources (**Criterion 5**).

Therefore, the project would not cause wasteful, inefficient, and unnecessary consumption of building energy during project operation, or preempt future energy development or future energy conservation. A less than significant impact would occur.

Mitigation Measures: No mitigation measures are required.

b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less than Significant Impact. The Town does not have an adopted renewable energy or energy efficiency plan. The project would be required to comply with State and local plans for renewable energy and energy efficiency, including the CPUC's Strategic Plan, the Title 24 standards, and the CALGreen standards; refer to Response 4.6(a). Adherence to the CPUC's Strategic Plan energy requirements would ensure project conformance with the State's goal of promoting energy and lighting efficiency, while compliance with Title 24 standards and CALGreen standards would ensure the project incorporates energy efficient windows, insulation, lighting, ventilation systems, as well as water efficient fixtures. As such, the proposed project would result in less than significant impacts associated with renewable energy or energy efficiency plans.

Mitigation Measures: No mitigation measures are required.

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4.7 GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				✓
2) Strong seismic ground shaking?			✓	
3) Seismic-related ground failure, including liquefaction?			✓	
4) Landslides?				✓
b. Result in substantial soil erosion or the loss of topsoil?			✓	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				✓
d. Be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2001), creating substantial risks to life or property?				✓
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				✓
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				✓

This section is based on the *Mammoth Disposal Waste Transfer Station Update Geotechnical Investigation* (Geotechnical Report), prepared by Sierra Geotechnical Services Inc. (SGS), dated September 29, 2020; refer to Appendix C, *Geotechnical Report*.

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. According to the Geotechnical Report, the project site is not located within or immediately adjacent to any known active or potentially active faults, nor is it located within any Alquist-Priolo Earthquake Fault Zone. Thus, no impacts would result in this regard.

Mitigation Measures: No mitigation measures are required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The project site is located in the southwestern edge of the Mono Lake Long Valley caldera near the eastern flank of the Sierra Nevada. According to the Geotechnical Report, the nearest active fault to the project site is the Hilton Creek fault, located approximately 1.26 miles east of the project site. The fault is reported to have the potential for a moment magnitude (M_w) scale of 6.7. As such, development on the project site has the potential for moderate ground shaking.

In accordance with the California Building Code (CBC) and Municipal Code Chapter 15.04, *Building Regulations and Codes*, structures built for human occupancy must be designed to meet or exceed the CBC standards for earthquake resistance. The CBC assigns seismic ground motions values for new construction and includes earthquake safety standards based on a variety of factors including occupancy type, types of soils and rocks on-site, and strength of probable ground motion at the project site. Municipal Code Chapter 15.24, *Design Requirements*, includes local building codes related to snow-loading and construction requirements related to roof materials, concrete placement, and footing/foundation. In addition, Municipal Code Section 12.08.078, *Standard Grading Permit Requirements*, and Section 12.08.080, *Engineered Grading Permit Requirements*, requires engineered plans and a soils report be submitted with a grading permit application. The Town would review applicable engineering plans during the design plan review process to ensure compliance with specific recommended geotechnical improvements. Therefore, although the Town is located in a seismically active area, impacts associated with seismic ground shaking would be less than significant.

Mitigation Measures: No mitigation measures are required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. The potential for seismic-related ground failure is associated with the probability of severe ground shaking because of a nearby active fault. Liquefaction is the phenomenon that occurs when saturated granular soils develop high-pore water pressures during seismic shaking and behave like a heavy fluid. This phenomenon generally occurs in areas of high seismicity where groundwater is shallow and loose granular soils or hydraulic fill soils subject to liquefaction are present. For liquefaction to develop, loose granular sediments below the groundwater table must be present; and shaking of sufficient magnitude and duration must occur.

According to the Geotechnical Report, the project site is not located within any areas zoned for liquefaction hazards by local/State jurisdictions. Given the lack of a static or perched water table, and the dense nature of the existing soils on-site, there is low potential for liquefaction to occur. Additionally, the project would be required to comply with geotechnical design standards per Municipal Code Chapters

15.04 and 15.24, as well as Sections 12.08.078 and 12.08.080; refer to Response 4.07 (a) (ii). As such, impacts would be less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

iv. Landslides?

No Impact. Seismically induced landslides can overrun structures, people, or property, sever utility lines, and block roads. However, as indicated by the Geotechnical Report, the project site and surrounding areas are characterized as generally flat, and void of topographical features that are capable of producing a landslide. Additionally, the project site is not located in an area that is highly susceptible of landslides.[1] The Geotechnical Report concluded that there is no evidence of potential for landslides within the project site. Therefore, development of the proposed project would not expose people or structures to landslide hazards. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the project region include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

Construction Activities

Construction activities for the proposed project would involve excavation, grading, and activities that would disturb soil and leave exposed soil on the ground surface. The 59 Commerce Drive site would involve grading/excavation for the construction of the transfer station, office building, and utility infrastructure. The 264 Commerce Drive site would involve minor excavation activities for installation of the 6-foot perimeter wall (with associated wall footings) and drywell expansion activities. Common means of soil erosion from construction sites include water, wind, and being tracked off-site by vehicles. These activities could result in soil erosion.

Development of the project site is subject to local and State codes and requirements for erosion control and grading during construction. Per Municipal Code 12.08.33, *Drainage, Erosion and Pollution*, the Town requires the submittal of plans that include erosion and sedimentation control devices to the Town Engineer for approval. The Lahontan Regional Water Quality Control Board's (LRWQCB) *Water Quality Control Plan* sets forth measures related to erosion and sedimentation control during construction

[1] California Department of Conservation, *Landslide Inventory (Beta)*, https://maps.conservation.ca.gov/cgs/lsi/, accessed February 25, 2021.

activities.[2] Further, the Construction General Permit issued by the State Water Resources Control Board (SWRCB), effective July 17, 2012, regulates construction activities to minimize water pollution, including sediment.[3] The proposed improvements at the project site would be subject to National Pollution Discharge Elimination System (NPDES) permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The proposed project's construction contractor would be required to prepare and implement a SWPPP and associated best management practices (BMPs) in compliance with the Construction General Permit (CGP) during grading and construction. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. Thus, project compliance with existing local and State regulations, as well as compliance with recommended excavation practices would reduce impacts in this regard to less than significant levels.

Operational Activities

The project area is relatively flat with minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the site, and loose erodible soils near on-site structures would be removed during the construction phase of the project. At project completion, completed structures would be developed and operations would not likely result in substantial loss of topsoil or erosion. Thus, soil erosion and loss of topsoil impacts from construction and operational activities associated with the proposed project would be less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

No Impact. Refer to Responses 4.7(a)(iii) and 4.7(a)(iv) pertaining to liquefaction and landslides, respectively. According to the Geotechnical Report, soils within the immediate vicinity of the on-site building structures consist of dense, sands with minor amounts of fines. Under these soil conditions, project implementation is not expected to result in lateral spreading. The project site is not located within any areas known for past cases of substantial subsidence. Due to the project site's lack of a static or perched water table and the dense nature of bearing soils on-site, project implementation is not expected to result in liquefaction. As such, no impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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[2] California Regional Water Quality Control Board Lahontan Region, Water Quality Control Plan for the Lahontan Region (Basin), *Chapter 4.3, Stormwater Runoff, Erosion, and Sedimentation*, March 31, 1995, https://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/docs/ch4_2_4_3.pdf, accessed February 10, 2021.

[3] State Water Resources Control Board, National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, *Order No. 2012-0006-DWQ, NPDES No. CAS000002, July 17, 2012*, https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2012/wqo2012_0006_dwq.pdf, accessed February 10, 2021.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

No Impact. Expansive soils are found to be associated with soils, alluvium, and bedrock formations that contain clay minerals susceptible to expansion under wetting conditions and contraction under drying conditions. Depending upon the type and amount of clay present in a geologic deposit, these volume changes (shrink and swell) can cause severe damage to slabs, foundations, and concrete flatwork. According to the Geotechnical Investigation, soils in the immediate vicinity of the building consists of silty, fine to coarse sands. As such, there is a very low shrink/swell potential at the project site. Thus, no impacts related to expansive soils are anticipated.

Mitigation Measures: No mitigation measures are required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The project would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, no impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

f.) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. According to the General Plan EIR, there are no known unique paleontological resources or sites, and no known unique geologic features in the Town of Mammoth Lakes. The soils in the project area are glacial till and relatively recent volcanic materials, and therefore no paleontological resources would be expected to occur in the area. Given the lack of potential for paleontological resources within or near the project site, project implementation would not have the potential to result in significant adverse impacts to such resources. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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4.8 GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

Global Climate Change

California is a substantial contributor of global greenhouse gases (GHGs), emitting approximately 425 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) per year.[1] Methane (CH_4) is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect, which is to increase the earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation will be required to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

The impact of human activities on global climate change is apparent in the observational record. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of CO_2, CH_4, and nitrous oxide (N_2O) from before the start of industrialization (approximately 1750), to over 650,000 years ago. For that period, it was found that CO_2 concentrations ranged from 180 to 300 parts per million (ppm). For the period from approximately 1750 to the present, global CO_2 concentrations increased from a pre-industrialization period concentration of 280 to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range. As of October 2020, the highest monthly average concentration of CO_2 in the atmosphere was recorded at 417 ppm.[2]

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 ppm carbon dioxide equivalent (CO_2e)[3] concentration is required to keep global mean warming below 2 degrees Celsius (^oC), which in turn is assumed to be necessary to avoid dangerous climate change.

[1] California Air Resources Board, *California Greenhouse Gas Emissions for 2000 to 2018,* https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2018/ghg_inventory_trends_00-18.pdf, accessed February 15, 2021.

[2] Scripps Institution of Oceanography, *Carbon Dioxide Concentration at Mauna Loa Observatory, The Keeling Curve*, https://scripps.ucsd.edu/programs/keelingcurve/, accessed February 15, 2021.

[3] Carbon Dioxide Equivalent (CO_2e) – A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

Regulatory Framework

Federal

U.S. Environmental Protection Agency Endangerment Finding. The U.S. Environmental Protection Agency's (EPA) authority to regulate GHG emissions stems from the U.S. Supreme Court decision in *Massachusetts v. EPA* (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Clean Air Act (Chapter 40 of the Code of Federal Regulations, or 40 CFR) and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the EPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six GHGs (CO_2, CH_4, N_2O, hydrofluorocarbons [HFCs], perfluorocarbons [PFCs], and sulfur hexafluoride [SF_6]) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing Clean Air Act (CAA) and the EPA's assessment of the scientific evidence that form the basis for the EPA's regulatory actions.

In 2009, the EPA published a rule for the mandatory reporting of GHG from stationary sources that in general emit 25,000 metric tons or more of CO_2e per year in the United States. Smaller sources and certain sectors such as the agricultural sector and land use changes are not included in the GHG Program. Implementation of 40 CFR Part 98 is referred to as the Greenhouse Gas Reporting Program (GHGRP). The rule requires reporting of GHG, but does not require control.

In 2010 (implemented January 2, 2011), the EPA promulgated rules addressing the prevention of significant deterioration (PSD) for GHGs as detailed in 40CFR 52.21 et seq. PSD applies to new major sources or major modifications at existing sources for pollutants where the area source is located is in attainment or unclassifiable with the National Ambient Air Quality Standards (NAAQS). PSD rules are implemented by the local APCD within the Title V Permit under EPA's GHG Tailoring Rule, issued in May 2010.

The project site, due to lack of stationary sources for GHG emissions, does not trigger the threshold for either the GHGRP or PSD programs.

Vehicle Emissions. On a federal level, vehicle emissions of GHGs are regulated jointly by the EPA and the National Traffic Safety Administration (NHTSA). The federal standards for on-road were established in two phases. Model years 2012 – 2016 and Phase 2 Model Years 2017-2025. Newer engines are required to have lower emissions and newer vehicles are required to have improved fuel economy that result in reduced emissions including GHGs.

Off-road vehicle emissions requirements have gradually changed (improved) over time starting in 1994/96 with requirements for Tier 1 diesel emissions requirements and culminating with Tier 4 Final emissions requirements in 2004. The Tier 4 Final requirements were phased in and came fully into effect in 2015. The regulations require a gradual phase out of lower tier engines and as older equipment wears out newer equipment will eventually only have Tier 4 Final engines. The standards require reduction of diesel particulate matter (DPM), nitrogen oxides (NOx), and hydrocarbons, but have the added benefit of reducing GHGs.

U.S. Mayors Climate Protection Agreement. On February 16, 2005 the Kyoto Protocol, the international agreement to address climate disruption, became law for the 141 countries that have ratified it to date. On that day, Seattle Mayor Greg Nickels launched this initiative to advance the goals of the Kyoto Protocol

through leadership and action by at least 141 American cities. By the 2005 U.S. Conference of Mayors Annual Meeting in June, 141 mayors had signed the Agreement – the same number of nations that ratified the Kyoto Protocol. In May of 2007, Tulsa Mayor Kathy Taylor became the 500th mayor to sign on. Under the Agreement, participating cities commit to take the following three actions:

- Strive to meet or beat the Kyoto Protocol targets in their own communities, through actions ranging from anti-sprawl land-use policies to urban forest restoration projects to public information campaigns;

- Urge their state governments, and the federal government, to enact policies and programs to meet or beat the greenhouse gas emission reduction target suggested for the United States in the Kyoto Protocol — 7% reduction from 1990 levels by 2012; and

- Urge the U.S. Congress to pass the bipartisan greenhouse gas reduction legislation, which would establish a national emission trading system.

State

Assembly Bill 32 (California Global Warming Solutions Act of 2006). California passed the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32; California Health and Safety Code Division 25.5, Sections 38500 - 38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on Statewide GHG emissions. AB 32 requires that Statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then the California Air Resources Board (CARB) should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

Senate Bill 32. Signed into law in September 2016, SB 32 codifies the 2030 target in the recent Executive Order B-30-15. The bill authorizes the state board to adopt an interim GHG emissions level target to be achieved by 2030. Senate Bill (SB) 32 states that the intent is for the legislature and appropriate agencies to adopt complementary policies which ensure that the long-term emissions reductions advance specified criteria. In December 2017, CARB approved the *California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target* that provides guidance for compliance with SB 32.

Senate Bill 375. SB 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a sustainable communities' strategy (SCS) or alternative planning strategy (APS) that will prescribe land use allocation in that MPOs regional transportation plan. CARB, in consultation with MPOs, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets are updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets.

The topics to be addressed in an SCS are currently addressed either in the general plans for Mono County and the Town of Mammoth Lakes, or in the Resource Efficiency Plan (which was incorporated into the Mono County General Plan).

Executive Order S-3-05. Executive Order S-3-05 set forth a series of target dates by which Statewide emissions of GHGs would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The Executive Order directed the Secretary of the California Environmental Protection Agency (Cal/EPA) to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The Secretary also submits biannual reports to the governor and California Legislature describing the progress made toward the emissions targets, the impacts of global climate change on California's resources, and mitigation and adaptation plans to combat these impacts. To comply with the Executive Order, the Secretary of Cal/EPA created the California Climate Action Team, made up of members from various State agencies and commissions. The team released its first report in March 2006. The report proposed to achieve the targets by building on the voluntary actions of California businesses, local governments, and communities and through State incentive and regulatory programs.

Title 24, Part 6. The California Energy Efficiency Standards for Residential and Nonresidential Buildings, Title 24, Part 6 of the California Code of Regulations (CCR) and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Part 6 of Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2019 Title 24 standards took effect on January 1, 2020. Under 2019 Title 24 standards, residential buildings will use about 53 percent less energy, mainly due to solar photovoltaic panels and lighting upgrades, when compared to those constructed under 2016 Title 24 standards.[4] Implementation of Title 24 standards reduces GHG emissions from energy sources.

Title 24, Part 11. The California Green Building Standards Code (CCR Title 24, Part 11), commonly referred to as CALGreen, is a Statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in five green building topical areas. The most recent update to the CALGreen Code went into effect on January 1, 2020. Similar to Title 24 standards, implementation of CALGreen Code reduces GHG emissions from energy sources.

CARB 2017 Scoping Plan. On December 11, 2008, CARB adopted its Climate Change Scoping Plan (Scoping Plan), which functions as a roadmap to achieve GHG reductions in California required by AB 32 through subsequently enacted regulations. CARB's Scoping Plan contains the main strategies California will implement to reduce CO_2e emissions by 174 million metric tons (MT), or approximately 30 percent, from the

[4] California Energy Commission, *2019 Building Energy Efficiency Standards*, March 2018.

State's projected 2020 emissions level of 596 million $MTCO_2e$ under a business as usual (BAU)[5] scenario. This is a reduction of 42 million $MTCO_2e$, or almost ten percent, from 2002 to 2004 average emissions, but requires the reductions in the face of population and economic growth through 2020.

In December 2017, CARB approved the *California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (2017 Scoping Plan). This update focuses on implementation of a 40 percent reduction in GHGs by 2030 compared to 1990 levels. To achieve this the updated Scoping Plan draws on a decade of successful programs that addresses the major sources of climate changing gases in every sector of the economy:

- *More Clean Cars and Trucks:* The plan sets out far-reaching programs to incentivize the sale of millions of zero-emission vehicles, drive the deployment of zero-emission trucks, and shift to a cleaner system of handling freight statewide.

- *Increased Renewable Energy:* California's electric utilities are ahead of schedule meeting the requirement that 33 percent of electricity come from renewable sources by 2020. The Scoping Plan guides utilities to 50 percent renewables, as required under SB 350.

- *Slashing Super-Pollutants:* The plan calls for a significant cut in super-pollutants such as methane and HFC refrigerants, which are responsible for as much as 40 percent of global warming.

  Cleaner Industry and Electricity: California's renewed cap-and-trade program extends the declining cap on emissions from utilities and industries and the carbon allowance auctions. The auctions will continue to fund investments in clean energy and efficiency, particularly in disadvantaged communities.
- *Cleaner Fuels:* The Low Carbon Fuel Standard will drive further development of cleaner, renewable transportation fuels to replace fossil fuels.

- *Smart Community Planning:* Local communities will continue developing plans which will further link transportation and housing policies to create sustainable communities.

- *Improved Agriculture and Forests:* The Scoping Plan also outlines innovative programs to account for and reduce emissions from agriculture, as well as forests and other natural lands.

Local

Mono County Resource Efficiency Plan. The County incorporated the *Mono County Resource Efficiency Plan* (REP) within the *Mono County General Plan* in 2015 to identify the County's long-term strategies to reduce GHG emissions and provide energy, fuel, water, and monetary savings to the County's residents. The REP includes: 1) a baseline GHG emissions inventory; 2) a GHG emissions forecast and reduction target; 3) policies and programs to achieve the adopted target; and 4) a monitoring program. Policies addressing issues related to climate adaptation including flooding, reduced snowpack (and water availability),

[5] "Business as Usual" refers to emissions that would be expected to occur in the absence of GHG reductions; refer to http://www.arb.ca.gov/cc/inventory/data/bau.htm. Note that there is significant controversy as to what BAU means. In determining the GHG 2020 limit, CARB used the above as the "definition." It is broad enough to allow for design features to be counted as reductions.

economic issues, and ecosystems and biodiversity, are contained in the Mono County General Plan Land Use Element and Conservation/Open Space Element.

Thresholds of Significance

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions and gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. This section recommends certain factors to be considered in the determination of significance (i.e., the extent to which a project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHGs). The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (CEQA Guidelines Section 15064.7[c]). The California Natural Resources Agency has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the context of CEQA's requirements for cumulative impact analyses (CEQA Guidelines Section 15064[h][3]).[6,7] A project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project.[8]

The Town has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Although a few California air districts have adopted numerical significance threshold, neither CARB nor the Great Basin Unified Air Pollution Control District (GBUAPCD) that has jurisdiction of the Town have adopted a numerical significance threshold for assessing GHG emissions that is applicable to the project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions applicable to the Town, the methodology for evaluating the project's impacts related to GHG emissions focuses on its consistency with Statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the project's GHG-related impacts on the environment.

Notwithstanding, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the project using recommended air quality models, as described below. The primary purpose of quantifying the project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or

[6] California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action*, pp. 11-13, 14, 16, December 2009, https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final_Statement_of_Reasons.pdf, accessed February 15, 2021.

[7] State of California Governor's Office of Planning and Research, *Transmittal of the Governor's Office of Planning and Research's Proposed SB97 CEQA Guidelines Amendments to the Natural Resources Agency*, April 13, 2009, https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/C01.pdf, accessed February 15, 2021.

[8] 14 California Code of Regulations Section 15064(h)(3).

mitigation of GHG emissions. However, the significance of the project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the project.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact.

Project-Related Sources of Greenhouse Gases

Project-related GHG emissions would include emissions from direct and indirect sources. The proposed project would result in direct and indirect emissions of CO_2, N_2O, and CH_4, and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. Analysis of mobile emissions is based primarily upon the *Mammoth Disposal Transportation Analysis* (Transportation Analysis) prepared by LSC Transportation Consultants, dated February 22, 2021 (refer to Appendix F, *Transportation Analysis*). California Emissions Estimator Model Version 2016.3.2 (CalEEMod) relies upon trip data within the project's Transportation Analysis and project specific land use data to calculate emissions. Vehicle emission factors were taken from CARB's 2017 EMission FACtor (EMFAC2017) model and incorporated into CalEEMod.

Existing GHG Emissions

The existing project site is broken down into uses at two separate sites: 59 Commerce Drive Site and 264 Commerce Drive Site. Existing structures on the 59 Commerce Drive Site include a 1,200-square foot office building, guard/attendant shed, outdoor transfer station (primarily consisting of bins and containers), 3,050-square foot buy-back/recycling center building, and an outdoor bin storage area. The 264 Commerce Drive Site is currently developed with a 6,800-square foot vehicular fleet maintenance building and a paved area utilized for truck (fleet) parking. A CalEEMod model run was conducted to quantify the GHG emissions from the existing project site; refer to Table 4.8-1, *Annual Greenhouse Gas Emissions*. Trip generation rates associated with the existing use were based on the Transportation Analysis. According to the Transportation Analysis, the existing project site generates approximately 504 mobile daily trips.

Project GHG Emissions

The project proposes to 1) expand the existing transfer station at the 59 Commerce Drive Site, 2) relocate the buy-back/recycling center (currently at the 59 Commerce Drive Site) to the 264 Commerce Drive Site,

Table 4.8-1
Annual Greenhouse Gas Emissions

Source	CO_2	CH_4		N_2O		Total Metric Tons of CO_2e[2,4]
	Metric Tons Per Year[1]	Metric Tons Per Year[1]	Metric Tons of CO_2e[2]	Metric Tons Per Year[1]	Metric Tons of CO_2e[2]	
EXISTING CONDITIONS						
Direct Emissions						
Area Source	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Mobile Source	756.84	0.03	0.70	<0.01	<0.01	757.54
Total Direct Emissions[3]	*756.84*	*0.03*	*0.70*	*<0.01*	*<0.01*	*757.54*
Indirect Emissions						
Energy	20.28	<0.01	0.02	<0.01	0.07	20.38
Solid Waste	6.27	0.37	9.26	<0.01	<0.01	15.53
Water Demand	2.98	0.05	1.27	<0.01	0.37	4.62
Total Indirect Emissions	*29.53*	*0.42*	*10.56*	*<0.01*	*0.44*	*40.53*
Total Existing Emissions	***798.07 $MTCO_2e$ per year***					
PROPOSED PROJECT						
Direct Emissions						
Construction (amortized over 30 years)	4.78	0.01	0.21	<0.01	0.02	5.01
Area Source	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Mobile Source	1,108.68	0.04	0.99	<0.01	<0.01	1,109.66
Total Direct Emissions[3]	*1,113.45*	*0.05*	*1.20*	*<0.01*	*0.02*	*1,114.68*
Indirect Emissions						
Energy	34.63	<0.01	0.04	<0.01	0.13	34.80
Solid Waste	6.84	0.40	10.11	<0.01	<0.01	16.96
Water Demand	6.06	0.12	2.88	<0.01	0.83	9.77
Total Indirect Emissions[3]	*47.54*	*0.52*	*13.04*	*<0.01*	*0.95*	*61.53*
Total Project-Related Emissions[3]	***1,176.20 $MTCO_2e$ per year***					
Total Net Project Emissions[3]	***378.13 $MTCO_2e$ per year***					

Notes:
1. Emissions were calculated using CalEEMod version 2016.3.2.
2. Totals may be slightly off due to rounding.
3. The reduction/credits for operational emissions are based on "mitigation" included in CalEEMod and are required by 2019 Title 24 Standards. The emissions results in this table represent the "mitigated" emissions shown in Appendix A.
4. Carbon dioxide equivalent values calculated using the U.S. Environmental Protection Agency Website, *Greenhouse Gas Equivalencies Calculator*, http://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator, last updated March 2020.

Refer to Appendix A, *Air Quality/GHG/Energy Data*, for detailed model input/output data.

and 3) relocate the fleet maintenance operations (currently at the 264 Commerce Drive Site) to the 59 Commerce Drive Site. Specifically, improvements at the 59 Commerce Drive Site would include: construction of a 9,600-square foot transfer station building; replacement of the guard/attendant shed with a pre-manufactured house; installation of truck scales near the proposed scale house; installation of a 2,250-square foot metal canopy structure over the proposed truck scales and scale house; construction of a new approximately 1,855-square foot office building; and repurposing of the existing 3,050-square foot buy-back/recycling center building with the relocated fleet maintenance facility from the 264 Commerce Drive Site.

Table 4.8-1 presents the GHG emissions from the existing use, the proposed project, and the project's net operational emissions. The net operational emissions were calculated by subtracting the existing use emissions from the proposed project emissions. Project GHG emissions were calculated using CalEEMod and an EMFAC2017. The proposed project would include GHG emission reductions from the most current building energy Efficiency Standards, the 2019 Title 24 building code and the 2019 California Green Building Standards Code (CALGreen). Compliance with Title 24 and CALGreen standards would ensure the project incorporates energy efficient windows, insulation, lighting, ventilation systems, as well as water efficient fixtures. Table 4.8-1 presents the estimated existing and proposed project's CO_2, N_2O, CH_4, and CO_2e emissions. CalEEMod outputs are contained within Appendix A.

Direct Project-Related Sources of Greenhouse Gases

- *Construction Emissions*. Construction GHG emissions are typically summed and amortized over the lifetime of the project (assumed to be 30 years), then added to the operational emissions.[9] As seen in Table 4.8-1, the proposed project would result in 5.01 $MTCO_2e$ when amortized over 30 years.
- *Area Source*. Area source emissions were calculated using CalEEMod and project-specific land use data. Project-related area sources include exhaust emissions from landscape maintenance equipment, such as lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the site. The project would result in negligible GHG emissions from area sources; refer to Table 4.8-1.
- *Mobile Source*. According to the Transportation Analysis, the proposed project would generate 692 daily trips. The project-generated daily trips account for the Benton Crossing Landfill trips that would be diverted to the project site; refer to *Vehicle Miles Traveled* discussion below. As such, this analysis is based on the Transportation Analysis and is specific to the proposed project. Compared to the existing conditions, this would represent a net increase of 188 daily trips. Based on the proposed project-generated daily vehicle trips, the proposed project would result in approximately 1,109.66 $MTCO_2e$/year of mobile source-generated GHG emissions; refer to Table 4.8-1. As seen in Table 4.8-1, existing conditions would result in approximately 757.54 $MTCO_2e$/year of mobile source generated GHG emissions. Thus, the project would cause an increase of approximately 352.12 $MTCO_2e$/year from mobile emissions.

Vehicle Miles Traveled

Further, municipal solid waste from the Town of Mammoth Lakes and surrounding communities is currently disposed of at the Benton Crossing Landfill, located in unincorporated Mono County approximately 9.5 miles northeast of the Town, either directly by individual patrons or via Mammoth Disposal route trucks. As the Benton Crossing Landfill is anticipated to reach capacity and will stop receiving waste by January 1, 2023, such municipal solid waste will have to be transported to other landfill facilities located further from waste source locations (refer to Exhibit 2-1, *Regional Vicinity*).

[9] The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold,* October 2008).

The purpose of the proposed project is to increase handling volume capacity for municipal solid waste at the existing Town of Mammoth Lakes Mammoth Disposal Transfer Station such that individual patrons and route trucks from Mammoth Lakes and the surrounding community can dispose of waste at the transfer station (closer to the waste source locations). The municipal solid waste would then be sorted, compacted, and consolidated at the transfer station into haul trucks (larger than the facility is currently capable of handling) for transporting to an off-site landfill facility in lieu of individual patron or route truck trips, thus resulting in fewer VMT for trips accessing the surrounding vicinity.

Indirect Project-Related Sources of Greenhouse Gases

- *Energy Consumption*. Energy consumption emissions were calculated using CalEEMod and project-specific land use data. Electricity and liquid propane gas (LPG) services at the project site would be provided by Southern California Edison (SCE) and AmeriGas, respectively. As shown in Table 4.8-1, the project would indirectly result in 34.80 $MTCO_2e$/year due to energy consumption, while existing conditions would result in 20.38 $MTCO_2e$/year. Thus, the project would cause an increase of approximately 14.42 $MTCO_2e$/year from energy consumption.
- *Water Demand*. The project would be required to comply with the CALGreen Code, which requires newer developments to be fitted with low flow plumbing fixtures and fittings, as well as water-efficient landscaping. The project is anticipated to consume approximately 3.9 million gallons of water per year, resulting in 9.77 $MTCO_2e$/year. Under existing conditions, the current on-site use consumes approximately 2.1 million gallons of water per year, resulting in 4.62 $MTCO_2e$/year. Therefore, the proposed project would consume a net increase of 1.8 million gallons of water when compared to existing conditions. While the proposed project would increase water demand, future distribution of water would have a lower carbon footprint due to SB 100 and SCE's production of renewable energy. As such, the proposed project would result in an increase of approximately 5.15 $MTCO_2e$/year from water demand.
- *Solid Waste*. Solid waste associated with operations of the proposed project would result in 16.96 $MTCO_2e$/year, while existing conditions would result in 15.53 $MTCO_2e$/year; refer to Table 4.8-1. Thus, the proposed project would result in a net increase of 1.43 $MTCO_2e$/year from solid waste.

Total Proposed Project-Related Sources of Greenhouse Gases

As shown in Table 4.8-1, the total amount of project related GHG emissions from direct and indirect sources combined, minus the existing use GHG emissions, would be approximately 378.13 $MTCO_2e$ per year.

Consistency with Applicable GHG Plans, Policies, or Regulations

The Town does not currently have an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. As such, this section focuses on analyzing the proposed project's consistency with applicable regional and Statewide plans that were adopted for the purpose of reducing and/or mitigating GHG emissions. State policy and standards adopted for reducing GHG emissions applicable to the proposed project include Executive Order S-3-05, AB 32, and SB 32. The quantitative goal of these regulations is to reduce GHG emissions to 1990 levels by 2020, 40 percent below 1990

levels by 2030, and to 80 percent below 1990 levels by 2050. The following discussion analyzes the project's consistency with the 2017 Scoping Plan, the Mono County Resource Efficiency Plan, and the Town of Mammoth Lakes General Plan.

Consistency with the 2017 CARB Scoping Plan

As discussed above, the 2017 Scoping Plan identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the first update to the Scoping Plan (2013). Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions would be adopted as required to achieve Statewide GHG emissions targets. Table 4.8-2, *2017 Scoping Plan Consistency Analysis*, shows an evaluation of applicable reduction actions/strategies by emissions source category to determine how the project would be consistent with or exceed reduction actions/strategies outlined in the 2017 Scoping Plan. As shown in Table 4.8-2, the project is consistent with all applicable actions/strategies.

Table 4.8-2
2017 Scoping Plan Consistency Analysis

Actions and Strategies	Project Consistency Analysis
SB 350	
Achieve a 50 percent Renewables Portfolio Standard (RPS) by 2030, with a doubling of energy efficiency savings by 2030.	**Consistent**. The proposed project includes improvements on transfer station facilities and would not involve the provision of electricity. The project would utilize electricity from SCE which would be required to comply with SB 350. As such, the project would be consistent in this regard.
Low Carbon Fuel Standard (LCFS)	
Increase stringency of carbon fuel standards; reduce the carbon intensity of fuels by 18 percent by 2030, which is up from 10 percent in 2020.	**Not Applicable**. The LCFS applies to manufacturers of automotive fuels, not to individual land uses. Mobile emissions associated with the project in Table 4.8-1 reflect compliance with this regulation. Providers of transportation fuels would be required to demonstrate that the mix of fuels they supply for use in California meets the LCFS carbon intensity standards for each annual compliance period. GHG emissions related to vehicular travel by the project would benefit from this regulation and mobile source emissions generated by the project would be reduced with implementation of the LCFS consistent with reduction of GHG emissions under AB 32.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario)	
Maintain existing GHG standards of light and heavy-duty vehicles while adding an addition 4.2 million zero-emission vehicles (ZEVs) on the road. Increase the number of ZEV buses, delivery trucks, or other trucks.	**Consistent**. The proposed project would include improvements on transfer station facilities, which would include light- and heavy-duty truck uses during construction and operation. Trucks uses associated with the project would be required to comply with all CARB regulations, including the LCFS and newer engine standards. The proposed project would not conflict with the CARB's goal of adding 4.2 million zero-emission (ZEVs) on the road. Furthermore, the project would comply with the most recent Title 24 standards and CALGreen Code which would require the project install electric vehicles charging infrastructure and parking spaces. As such, the project would not conflict with the goals of the Mobile Source Strategy and would be consistent in this regard.

Table 4.8-2, continued

Actions and Strategies	Project Consistency Analysis
Short-Lived Climate Pollutant (SLCP) Reduction Strategy	
Reduce the GHG emissions of methane and hydrofluorocarbons by 40 percent below the 2013 levels by 2030. Furthermore, reduce the emissions of black carbon by 50 percent below the 2013 levels by the year 2030.	**Consistent**. A solid waste transfer station receives municipal solid waste, then sorts, compacts, and transports such waste to an off-site end point. On-site operations also limit the amount of time solid waste remains at the facility to less than 72 hours. As such, no decomposition (associated with extended timeframes) or actual landfill activities would occur on-site and the project would not emit a large amount of CH_4 (methane) emissions; refer to Table 4.8-1. Furthermore, the project would comply with all hydrofluorocarbon (HFC) regulations. Approximately 15 percent of California's major anthropogenic sources of black carbon include fireplaces and woodstoves.[1] The project would not include hearths (woodstove and fireplaces) to be installed in the proposed transfer station facilities. As such, the proposed project would not conflict with the SLCP reduction strategy and would be consistent in this regard.
Sustainable Freight Action Plan	
Improve the freight system efficiency and maximize the use of near zero emission vehicles and equipment powered by renewable energy. Deploy over 100,000 zero-emission trucks and equipment by 2030.	**Consistent**. As described above, truck uses associated with the project site would be required to comply with all CARB regulations, including the LCFS and newer engine standards. Additionally, the project would not conflict with CARB's goal to deploy over 100,000 zero-emission trucks and equipment by 2030, as the project would comply with all future applicable regulatory standard adopted by CARB. As such, the project would be consistent in this regard.
SB 375 Sustainable Communities Strategy	
Increase the stringency of the 2035 GHG emission per capita reduction target for metropolitan planning organizations (MPO).	**Consistent**. Refer to Table 4.8-3, *Mono County Resource Efficiency Plan Consistency Analysis*. According to the *2019 Regional Transportation Plan*, prepared by the Mono County Local Transportation Commission and dated December 9, 2019, the topics to be addressed in an Sustainable Communities Strategy (SCS) are currently addressed either in the General Plans for Mono County and the Town of Mammoth Lakes, or in the Resource Efficiency Plan (REP) (which was incorporated into the Mono County General Plan). The REP identifies the County's long-term strategies to reduce GHG emissions and provide energy, fuel, water, and monetary savings to the County's residents. The REP includes: 1) a baseline GHG emissions inventory; 2) a GHG emissions forecast and reduction target; 3) policies and programs to achieve the adopted target; and 4) a monitoring program. Based on Table 4.8-3, the project would be consistent with the REP and would not conflict with the goals of SB 375.
Post-2020 Cap and Trade Programs	
The Cap-and-Trade Program will reduce greenhouse gas (GHG) emissions from major sources (covered entities) by setting a firm cap on statewide GHG emissions while employing market mechanisms to cost-effectively achieve the emission-reduction goals.	**Not applicable**. This program involves capping emissions from large-scale electricity generation, industrial facilities, and broad scoped fuels. As shown in Table 4.8-1, the proposed project would generate approximately 1,176.20 $MTCO_2e$/year, which is below the 25,000 $MTCO_2e$/yr Cap-and-Trade screening level. As such, the proposed project would not be subject to the requirements of the Cap-and-Trade Program.

Notes:
1. California Air Resources Board, *California's 2017 Climate Change Scoping Plan, Figure 4: California 2013 Anthropogenic Black Carbon Emission Sources*, November 2017.

Source: California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, November 2017.

Consistency with the Mono County Resource Efficiency Plan

The County incorporated the *Mono County Resource Efficiency Plan* (REP) within the *Mono County General Plan* in 2015 to identify the County's long-term strategies to reduce GHG emissions and provide energy, fuel, water, and monetary savings to the County's residents. Table 4.8-3, *Mono County Resource Efficiency Plan Consistency Analysis*, evaluates the project's consistency with applicable REP policies. As shown in Table 4.8-3, the project is consistent with all applicable REP policies.

Table 4.8-3
Mono County Resource Efficiency Plan Consistency Analysis

Policies	Project Consistency Analysis[2]
Policy CO.2.A.i: Support and promote residential and nonresidential green building construction.	**Consistent**. The project is designed to comply with the most recent Title 24 standards and CALGreen Code; all project details would be confirmed at the time of Building Permit Review.
Policy CO.4.A.i: Support and incentivize residential and nonresidential distributed renewable energy generation.	**Consistent**. The proposed project includes improvements on transfer station facilities and would not involve the provision of electricity. The project would utilize electricity from SCE which would be required to comply with SB 350; refer to Table 4.8-2.
Policy CO.5.A.i: Increase composting and recycling programs, and reduce waste generation, throughout the county.	**Consistent**. Project operation (transfer station facilities) would be required to comply with all applicable legislations. Waste produced by the project would be required to comply with the provisions of AB 939 and AB 341, requiring diversion of 50 percent of a jurisdiction's solid waste stream and 75 percent diversion of commercial waste, respectively.
Policy CO.6.A.i: Encourage reduced water consumption in residential and nonresidential properties.	**Consistent**. The project would meet current California Green Building Standards Code for indoor water use. This may include installation of water efficient irrigation systems and water reducing features and fixtures.
Policy C.1.A.i: Provide for viable alternatives to travel in single-occupancy vehicles.	**Consistent**. The project would be located within walking distance of three Eastern Sierra Transit bus stops (purple line) along Meridian Boulevard and College Parkway to the south. There are also existing Class I multi-use paths for pedestrians and bike users in the vicinity, while Class II bike lanes are planned along Meridian Boulevard to the south of the project site.
Policy C.1.A.iii: Reduce vehicle miles traveled from employee commutes and County operations.	**Consistent**. The project would be located within walking distance of three Eastern Sierra Transit bus stops (purple line) along Meridian Boulevard and College Parkway to the south. There are also existing Class I multi-use paths for pedestrians and bike users in the vicinity (Meridian Connector), while Class II bike lanes are planned along Meridian Boulevard to the south of the project site. Therefore, the proposed project would provide multiple modes of transportation which would enable a reduction in VMT from employee commutes.
Policy C.1.A.iv: Encourage the use of alternative fuels in County operations and throughout the community.	**Consistent**. Refer to Policy C.1.A.iii.
Policy LU.1.A.i: Concentrate new growth and development within existing community planning areas.	**Consistent**. Refer to Section 4.11, *Land Use and Planning*. The project site is located within the Mammoth Lakes Business Park adjacent to other industrial businesses. Further, the entire project site is designation Institutional (I). The Industrial land use designation allows a limited variety of light manufacturing and service uses that can be contained within wholly enclosed structures. As such, the proposed expansion of the

Table 4.8-3, continued

Policies	Project Consistency Analysis[2]
	transfer station building, relocation of the buy-back/recycling center and fleet maintenance facility between the 59 Commerce Drive and 264 Commerce Drive Sites, and other site improvements are permitted under the Industrial designation. Additionally, the entire project site is located within the Town's Industrial zoning district. The Industrial zoning district is intended for viable industrial uses distanced from residential uses or other incompatible uses in order to protect residential and commercial uses from noise, odor, dust, smoke, truck traffic, and other objectionable influences incidental to certain industrial uses. Overall, the propose project would be developed within existing community planning areas, particularly for industrial development.
Policy LU.1.A.ii: Concentrate future tourist-serving and nonresidential development around existing and planned transportation routes and stops.	**Consistent**. Refer to Policy C.1.A.iii.
Policy LU.2.A.i: Reduce greenhouse gas emissions through local land use and development decisions, and collaborate with local, state, and regional organizations to promote sustainable development.	**Consistent**. The proposed project would comply with Title 24 requirements and California Green Building Code standards for all propose new or repurposing buildings. This may include installation of energy efficient windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in buildings. Additionally, the project would be located within walking distance of three Eastern Sierra Transit bus stops (purple line) along Meridian Boulevard and College Parkway to the south. There are also existing Class I multi-use paths for pedestrians and bike users in the vicinity (Meridian Connector), while Class II bike lanes are planned along Meridian Boulevard to the south of the project site. Overall, the project would reduce GHG emissions through compliance with existing building energy efficiency standards and a reduction in Vehicle Miles Traveled (VMT) through alternative modes of transportation.

Sources: County of Mono, *Mono County General Plan*, 2009.

Consistency with Town of Mammoth Lakes General Plan

The General Plan includes goals, policies, actions, and infrastructure to achieve a progressive and comprehensive multimodal transportation system through implementation of "feet-first" sustainability, and smart-growth oriented principles. Table 4.8-4, *General Plan Consistency Analysis*, evaluates the project's consistency with applicable General Plan policies. As shown in Table 4.8-4, the project is consistent with all applicable General Plan policies.

Table 4.8-4
General Plan Consistency Analysis

Policies	Project Consistency Analysis
Mobility Element	
Goal M.16: Create a sustainable transportation system that reduces Vehicle Miles Traveled (VMT) and peak period vehicle trips, thereby supporting local and regional air quality, greenhouse gas emission reduction, and public health objectives.	
Policy M.16.1: Reduce automobile trips by promoting and facilitating pedestrian, bicycle, transit and parking	**Consistent**. The project would be located within walking distance of three Eastern Sierra Transit bus stops (purple line) along Meridian Boulevard and College Parkway to the

Table 4.8-4, continued

Policies	Project Consistency Analysis
management strategies and programs through the following: • Implementation of compact pedestrian-oriented development that provides a mix of land uses within walking or biking distance that meet the daily needs of residents and visitors; • Encouraging clustered and infill development; • Encouraging and developing land use policies that focus development potential in locations best served by transit and other alternative transportation; and • Implementing parking strategies that encourage the "park-once" concept.	south. There are also existing Class I multi-use paths for pedestrians and bike users in the vicinity (Meridian Connector), while Class II bike lanes are planned along Meridian Boulevard to the south of the project site. Therefore, the proposed project would provide multiple modes of transportation which would enable a reduction in VMT from employee commutes.
Policy M.16.2: Require new development to implement Transportation Demand Management (TDM) measures.	**Consistent**. According to the *Mammoth Disposal Transportation Analysis Memorandum*, prepared by LSC Transportation Consultants, Inc. (LSC), dated February 22, 2021, the project would have a net increase of 18 peak hour trips. Additionally, all intersections meet the level of service (LOS) standard per the General Plan, without and with the project. As such, TDM measures are not required for the proposed project.
Resource Management and Conservation Element	
Goal R.11: Reduce greenhouse gas emissions.	
Policy R.11.A: Support the objectives of the U.S. Mayors Climate Protection Agreement, Assembly Bill 32, and California Executive Order S-03-05 and implement actions to reduce Mammoth Lakes' carbon footprint.	**Consistent**. The project's consistency with the objectives of U.S. Mayors Climate Protection Agreement, AB 32, and Executive Order S-3-05 is demonstrated throughout this section, under Response 4.8(b).
Sources: Town of Mammoth Lakes, *Town of Mammoth Lakes General Plan*, 2019.	

Conclusion

In summary, the plan consistency analysis provided above demonstrates that the project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the 2017 Scoping Plan, the Mono County Resource Efficiency Plan, and the Town of Mammoth Lakes General Plan. Therefore, the project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Furthermore, because the project is consistent and does not conflict with these plans, policies, and regulations, the project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, project-specific impacts with regard to GHGs would be less than significant.

Mitigation Measures: No mitigation measures are required.

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4.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✓	
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✓
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				✓
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?		✓		
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				✓

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Exposure of the public or the environment to hazardous materials could occur through improper handling or use of hazardous materials or hazardous wastes particularly by untrained personnel, a transportation accident, environmentally unsound disposal methods, or fire, explosion, or other emergencies.

Construction

Short-term construction activities for the proposed project would not involve the routine transport, use, or disposal of hazardous materials. With the exception of utilizing gasoline and diesel fuels for construction equipment and solvents for painting/finishing, no other hazardous materials would be transported to or from the project site or used for construction activities. Fuels and solvents for construction would be stored and utilized pursuant to existing State and local regulatory requirements for

handling, storage, and disposal of hazardous substances. Therefore, short-term construction impacts would be less than significant in this regard.

Operations

The 59 Commerce Drive Site is currently developed with a public small volume transfer station, buy-back/recycling center, and company office. The 264 Commerce Drive Site is currently developed with a vehicular fleet maintenance facility with the remainder of the site utilized for truck (fleet) parking. The transfer station accepts an average of two to four tons of non-industrial waste per day. Accepted waste includes household trash; household hazardous waste; bulky items (e.g., furniture and appliances); green waste (e.g., pine needles and yard debris); construction debris; ashes, electronics, and metal. The existing buy-back/recycling center accepts recyclable materials (including household hazardous waste) from the Town and surrounding areas of Mono County; sorts, bales, or otherwise organizes the materials for shipping; and ships the resulting commodities to various bulk recyclers or processing facilities. The existing facilities currently do not accept non-household hazardous waste. However, materials such as oil, diesel fuel, gasoline, and hydraulic fluid are currently used at the fleet maintenance facility and the facility currently accepts motor vehicle oil and hydraulic fluid for recycling.

The project proposes to 1) expand the existing transfer station at the 59 Commerce Drive Site, 2) relocate the buy-back/recycling center (currently at the 59 Commerce Drive Site) to the 264 Commerce Drive Site, and 3) relocate the fleet maintenance operations (currently at the 264 Commerce Drive Site) to the 59 Commerce Drive Site. The proposed 9,600-square foot transfer station building at the 59 Commerce Drive Site would be open from 6:30 a.m. to 9:00 p.m., seven days a week. Waste would be dumped to the tipping floor on-site and then sorted/compacted and moved directly to large haul trucks for transport. At this time, the end point for haul trucks is unknown and would be speculative to assume any one specific location.

Transfer Station Facility. Pursuant to California Code of Regulations Sections 17407.5 and 17408.2, hazardous wastes would continue to be prohibited at the proposed solid waste transfer station. Notwithstanding, some hazardous waste can be included in the waste stream delivered to the facility, as with the existing condition. As such, Mammoth Disposal implements best management practices as part of the off-loading process to ensure that acceptance of hazardous materials is minimized. Personnel would monitor the off-loading of materials and inspect loads for hazardous, toxic or infectious wastes, and unacceptable e-wastes. Notwithstanding, the potential exists for hazardous wastes to be present in the waste stream that is received at the transfer station. In the event hazardous wastes are discovered, they would be transferred by a licensed hauler to a permitted disposal facility in accordance with applicable Federal, State, and local standards and regulations. Typical incidents that could result in the accidental release of hazardous materials during sorting operations may include accidental spills. The project would be required to comply with all applicable standards and regulations regarding the handling and storage of hazardous materials pursuant to the Certified United Program Authority (CUPA), which is Mono County. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and impacts in this regard would be less than significant.

Buy-Back/Recycling Center. Similar to existing conditions, the proposed buy-back/recycling center would continue to accept household hazardous waste recycling. Acceptable recyclable materials at the

proposed buyback/recycling center would include antifreeze, car batteries, used motor oil, latex paints, universal waste (mercury containing materials such as fluorescent tubes and thermostats), household batteries, electronic waste (or "e-waste"), Cathode Ray Tubes (CRT)s, household hazardous waste, acids, bases, poisons or solvents. As such, this facility provides the public an opportunity to properly dispose of such waste. Similar to the existing condition, these materials would be transported off-site. This facility would continue to comply with existing Federal, State, and local laws and regulations governing the acceptance of household hazardous waste. The Applicant is required to submit a Report of Facility Information [RFI]) to Mono County (on behalf of the California Department of Resources Recycling and Recovery [CalRecycle]).[1] An RFI is an operations and design plan that describes the facility and how it would comply with State Minimum Standards. RFIs are required to be kept current. Such reporting effectively identify all hazardous wastes, such that they can be properly removed from the waste stream.[2] The buyback/recycling center would continue to serve the community by providing a proper disposal method for household hazardous waste in compliance with all applicable laws and regulations. As such, impacts as a result of the use, storage, and transportation of hazardous materials at the buyback/recycling center would be less than significant, similar to the existing condition.

Fleet Maintenance Facility. The project proposes relocation of the existing fleet maintenance facility to the 59 Commerce Drive Site. Mammoth Disposal vehicles, including route trucks, fork trucks, roll-off trucks, and rolling stock would be cleaned and repaired at this facility, similar to existing conditions. Fleet maintenance activities include changing engine oil and filters, changing transmission fluid, conducting inspection of cooling and fuel systems, etc., and involve the use of petroleum products, including oils and lubricants. Nonetheless, these petroleum projects would be used and stored at the new fleet maintenance facility. This facility would continue to be required to comply with all existing laws and regulations governing the use/handling/transport of hazardous materials, including those imposed by the Department of Toxic Substances Control (DTSC) and Mono County (as the CUPA). With compliance with all Federal, State, and local laws and regulations, impacts in this regard would be less than significant, similar to the existing condition.

Overall, construction and operational activities associated with the proposed project would not cause a significant hazard to the public or environment through the routine use, transport, or disposal of hazardous materials, compared to the existing condition. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. Accidental conditions can arise as a result of routine transport, use, and/or storage of hazardous materials; refer to Response 4.8(a). Further, construction activities could also result in accidental conditions during grading activities due to existing on-site contaminated soil, soil gas, and groundwater, if present.

[1] California Department of Resources Recycling and Recovery, *Sunset of Temporary and Conditional Disposal Exemptions Guidance for Solid Waste Facilities*, https://calrecycle.ca.gov/SWFacilities/UniWaste/Guidance, accessed March 18, 2021.

[2] Ibid.

As discussed in Section 2.2.1, the 59 Commerce Drive Site is currently developed with a public small volume transfer station, buy-back/recycling center, and company office, and the 264 Commerce Drive Site is developed with a vehicular fleet maintenance facility with the remainder of the site utilized for truck (fleet) parking. No releases of hazardous materials to soil, soil gas, or groundwater have been reported at the project site pursuant to Government Code Section 65962.5; refer to Response 3.9(d). Last, as the existing structures were constructed after 1990, the potential for existing asbestos-containing materials (ACMs) and lead-based paints (LBPs) in association with building materials is low. As such, the potential for accidental conditions during site grading activities as a result of existing conditions is considered less than significant.

As discussed under Response 4.9(a) above, all transport, use, and disposal of hazardous materials would continue to comply with current local, State and Federal laws and regulations. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would minimize the potential for risk involving upset and accidental conditions. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The nearest school is the Mammoth Elementary School, located approximately 0.28-mile to the west of the project site. As such, no impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. Government Code Section 65962.5 requires the DTSC and State Water Resources Control Board (SWRCB) to compile and update a regulatory site listing (per the criteria of the Section). The California Department of Health Services is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Section 116395 of the Health and Safety Code. Section 65962.5 requires the local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations (CCR), to compile, as appropriate, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste.

The project site is not listed pursuant to Government Code Section 65962.5.[3] Thus, no impact would result in this regard.

Mitigation Measures: No mitigation measures are required.

[3] California Environmental Protection Agency, *Cortese Listing*, https://calepa.ca.gov/sitecleanup/corteselist/, accessed February 22, 2021.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The closest airport to the project site is the Mammoth Yosemite Airport, located approximately 4.8 miles east of the site at 1300 Airport Road. According to the *Mammoth Yosemite Airport - ALUC Airport Safety Zone Plan/Land Use Plan (Existing Runway)* map, the project site is not located within any airport safety zones established for the Mammoth Yosemite Airport, or within an airport land use plan.[4] No impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact With Mitigation Incorporated. The County's *Emergency Operations Plan* (Mono County EOP), adopted in 2012, sets forth the responsibilities, functions, and operations of the Town government, other cities within the County and Federal and State agencies during emergency scenarios.[5] The Mono County EOP meets the State's Standardized Emergency Management System and addresses emergency scenarios and appropriate responses to seismic hazards; wildland and structural fires; volcanic hazards; flooding, storm, or dam failure; avalanche hazards; excessive weather and drought; mass casualty transportation incidents; hazardous materials release; public health emergencies; terrorism; and energy disruption. Further, the Town maintains *The Town of Mammoth Lakes Emergency Operations Plan* (Mammoth Lakes EOP), adopted in August 16, 2017 by Resolution No. 2017-71, which set forth the responsibilities, functions, and operations of the Town government and its interrelationship with other agencies and jurisdictions which provide services during an emergency. The Mammoth Lakes EOP meets the State's Standardized Emergency Management Systems requirements, provides emergency response procedures such as identification of critical hazard areas, locations for meeting and staging in an emergency event, communications, and emergency evacuation.

During the construction and operation phases, the proposed project would not interfere with any daily operations of emergency vehicles associated with the Mammoth Lakes Police Department (MLPD) provides all police services for the project area and operates approximately 1.1 miles to the northwest of MLPD and/or Mammoth Lakes Fire Protection District (MLFPD). All construction activities would be required to comply with Town standards and regulations, such as providing the necessary on- and off-site access and circulation for emergency vehicles and services during the construction and operation phases. Project construction is anticipated to occur in one phase, with construction activities beginning in May 2021 through July 2022, and would require partial temporary lane closures along Commerce Drive in order to install proposed utility infrastructure. Since construction activities may require partial temporary lane closures along Commerce Drive in order to install proposed utility connections, the project Applicant would be required to implement a traffic management plan (TMP) to maintain emergency

[4] Town of Mammoth Lakes, *Mammoth Yosemite Airport - ALUC Airport Safety Zone Plan/Land Use Plan (Existing Runway)*, https://www.ci.mammoth-lakes.ca.us/DocumentCenter/View/4802, July 24, 2014.

[5] County of Mono, *Mono County Emergency Operations Plan*, https://volcanoes.usgs.gov/vsc/file_mngr/file-133/mono_county_oa_eop_2012.pdf, November 2012.

access during the construction process (Mitigation Measure TRA-1). The TMP may include potential measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and the need for a construction flagperson to direct traffic during heavy equipment use, among others. Implementation of the TMP would provide congestion relief during short-term construction activities and ensure safe travel along existing travel routes.

Operations of the proposed project would be subject to compliance with emergency access standards and requirements specified by the Municipal Code Section 17.44.110, *Driveways and Site Access*. A 30-foot wide emergency access gate along the western perimeter would be constructed at the 59 Commerce Drive Site to provide secondary emergency access from the adjacent alley. Further, the project would also be required to go through the Town's development review and permitting process and would be required to incorporate all applicable design and safety standards and regulations as set forth by the California Building Code, MLFPD, and the Municipal Code to ensure that it does not interfere with the provision of local emergency services (e.g., provision of adequate access roads to accommodate emergency response vehicles, minimum turning radii, adequate numbers/locations of fire hydrants).

Overall, with implementation of Mitigation Measure TRA-1, the project's impacts in this regard would be reduced to less than significant levels.

Mitigation Measures: Refer to Mitigation Measure TRA-1.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. Refer to Response 4.20(a). According to the *CalFire Mono County Fire Hazard Severity Zones in SRA Map*, the project site is not located in or near a State responsibility area.[6] According to the *CalFire Draft Fire Hazard Severity Zones in LRA Map*, the project site is not designated as a very high fire hazard severity zone.[7] Thus, no impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

[6] California Department of Forestry and Fire Protection, Office of the State Fire Marshal, Mono County Fire Hazard Severity Zones in SRA Map, https://osfm.fire.ca.gov/media/6722/fhszs_map26.pdf, adopted November 7, 2007.

[7] California Department of Forestry and Fire Protection, Office of the State Fire Marshal, *Draft Fire Hazard Severity Zones in LRA Map, dated* September 2007.

4.10 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?			✓	
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				✓
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
1) Result in substantial erosion or siltation on- or off-site?			✓	
2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?			✓	
3) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			✓	
4) Impede or redirect flood flows?			✓	
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				✓
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✓

This section is based on the following documentation (refer to Appendix D, *Hydrologic Analysis and Data*):

- *Drainage Calculations for Mammoth Disposal Transfer Station Project 59 Commerce Drive/264 Commerce Drive Mammoth Lakes, California* (Drainage Calculations), prepared by Lawrence and Associates, April 29, 2021; and

- *Erosion Control and Landscape Plan* (ECLP), prepared by Lawrence and Associates, dated January 21, 2021.

a) Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. As part of Section 402 of the Clean Water Act, the Environmental Protection Agency (EPA) has established regulations under the National Pollutant Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the State Water Regional Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the Regional

Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The project site is within the jurisdiction of the Lahontan RWQCB (District 6).

Construction

Project construction could potentially result in short-term impacts to water quality due to the handling, storage, and disposal of construction materials, maintenance and operation of construction equipment, and earthmoving activities. Dischargers whose projects disturb one or more acres of soil, or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the SWRCB's *General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ* (General Construction Permit). The General Construction Permit requires the project Applicant to prepare and implement a storm water pollution prevention plan (SWPPP). The SWPPP would specify best management practices (BMPs) to be used during construction of the project to minimize or avoid water pollution, thereby reducing potential short-term impacts to water quality.

The project would disturb approximately 1.87 acres at the 59 Commerce Drive Site for the clearance, demolition, and construction of the new transfer station and office building. It is acknowledged that the project would not require grading activities at the existing buy-back/recycling center or the existing fleet maintenance building at the 264 Commerce Drive Site. Since the project would disturb greater than one acre, the proposed project would be subject to the requirements of the General Construction Permit under the NPDES program. The project Applicant would be required to prepare a Notice of Intent for submittal to the Lahontan RWQCB providing notification of intent to comply with the General Construction Permit. Additionally, the SWPPP would be required to be reviewed/approved by the Town, for water quality construction activities on-site. Upon completion of the project, the Applicant would be required to submit a Notice of Termination to the SWRCB to indicate that construction has been completed.

To further reduce construction-related impacts to water quality, the project would also be subject to conformance with Chapters 12.08 and 15.08, as well as Section 17.08.020 of the Town's Municipal Code. Municipal Code Chapter 12.08, *Land Clearing, Earthwork, and Drainage Facilities* establishes requirements for earthwork on private and public property. The standards require the protection of drainage paths and installation of devices capturing stormwater runoff at select sites. These requirements help prevent erosion of sediment and reduce runoff velocities. Municipal Code Chapter 15.08, *Construction Site Regulations*, require construction sites to protect drainage paths and control erosion from areas cleared of vegetation during construction. Municipal Code Section 17.08.020, *Standards for All Development and Land Use, Grading and Clearing*, also requires a grading permit for any lot graded or cleared of vegetation. Additionally, all construction and uses would comply with the Lahontan RWQCB requirements outlined in the *Water Quality Control Plan for the Lahontan Region (Basin Plan)*; refer to Response 4.10(e).

Compliance with NPDES requirements, as well as Chapters 12.08, 15.08, and Section 17.08.020 of the Municipal Code would reduce short-term construction-related impacts to water quality to a less than significant level.

Operations

59 Commerce Drive Site

Exterior Storm Drain Improvements. The existing on-site storm drain system 59 Commerce Drive Site includes a drywell near the main entrance to the facility. Storm water through the existing bin storage areas flows toward and along an existing infiltration trench, northwest of the existing office building. Surface drainage near the existing buy-back/recycling center includes a concrete wash pad area that slopes to a catch basin, dedicated oil/water separator, and retention tank.

The project proposes increased paved surfaces, increasing the runoff at the project site from 1.51 to 1.85 cubic feet per second (cfs) (for the 20-year peak flow storm event) and 2.43 cfs to 2.94 cfs (for the 100-year peak flow storm event). As such, the project proposes storm drain infrastructure on-site to increase the volume storage capacity at the project site during these storm events. The proposed project would remove the existing concrete wash pad area and recontour the slope such that storm water flows toward proposed collection drains/inlets and an underground infiltration system. The existing drywell and infiltration trenches would be replaced with new catch basins located north and south of the proposed transfer building, west of the existing maintenance shop, and near the main entrance to the site. As detailed in the Drainage Calculations provided in Appendix D, the new drainage system would have a 20-year one-hour event capacity and would exceed the infiltration volume requirements by the Lahontan RWQCB. Additionally, the new catch basins would comply with Chapter 12.08 of the Town Municipal Code, which minimizes erosion, damage, or sedimentation. As such, the proposed drainage improvements would meet with the Town and State regulations, and operational impacts would be less than significant in this regard. Refer to Appendix D for specific drainage areas, calculations, and on-site storage volume.

Interior Building Improvements. Project operations at the 59 Commerce Drive Site would include the operations of a new transfer station building. The new transfer station would implement a new tipping floor that would be sloped toward proposed interior centralized drains that would collect and convey drippings from the transfer station floor. The interior collection system would drain westerly to an underground retention tank, which would be equipped with a high-level float switch connected to a visible alarm in the transfer station building. As such, proposed building features would minimize the potential for pollutants from the tipping floor entering the runoff outside of the property boundaries. Operational impacts would be less than significant in this regard.

264 Commerce Drive Site

Exterior Storm Drain Improvements. The proposed project would utilize the existing drainage system at the 264 Commerce Drive Site. The existing system includes a wash pad, oil/water separator, trench drains, and drop inlets/dry wells to control stormwater runoff. Project operations are not anticipated to substantially increase the level stormwater runoff to the point of exceeding the capacity of the existing drainage system at the 264 Commerce Drive Site. Notwithstanding, the proposed project is subject to Chapter 12.08 of the Town Municipal Code, which requires storm drain improvements maintain the 20-year 1-hour storm event, estimated at 1-inch of precipitation at the site, or 1,730 cubic feet (cf) of volume. As such, the proposed project would remove/replace the existing wash pad and expand the existing drywell system. As part of the expansion of the drywell system, the project proposes to intercept and

connect to the existing slotted drain and oil-water separator in front of the building to the proposed drywell system. The former connection of the oil-waste separator to the public sewer system would be removed. The existing two drywells, including infiltration areas, comprise as estimated 1,300 cf of volume, slightly under the current Municipal Code requirements. To meet current standard, the proposed storm drain system must hold an additional 430 cf of volume. As such, the project proposes to expand the existing drywells to hold an additional 468 cf of additional water storage, for a total of 1,768 cf of volume storage, which would exceed Town's current standards; refer to Appendix D. The proposed expanded drywells would also include installation of a new filter/sand-oil interceptor. Last, the project would install a new AC swale near the south end of the property to direct stormwater runoff from the site into the south drywell. As such, the proposed project would comply with requirements listed for underground wells in the Groundwater Management Plan for the Mammoth Basin Watershed (Groundwater Management Plan); refer to Response 4.10(e). As such, the drainage system at the 264 Commerce Drive Site would meet the Town and State regulations regarding water quality, and operational impacts would be less than significant in this regard.

Interior Building Improvements. The proposed buy-back/recycle center does not include a transfer station at this facility. As such, no specific interior building improvements pertaining to drainage are proposed. Operational impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. The project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. As discussed in the *Mammoth Disposal Waste Transfer Station Update Geotechnical Investigation* (Geotechnical Report), prepared by Sierra Geotechnical Services, dated September 29, 2020 (Appendix C, *Geotechnical Investigation*), groundwater was not encountered during subsurface investigations, and is estimated to exist at a depth greater than approximately 250 feet beneath the project site. Construction activities for the proposed project would require minimal excavation and site grading is anticipated to be less than eight feet in depth. Although the project would result in an increase in impervious surfaces, the project's proposed infiltration system would meet all regional requirements for containing and infiltrating a 20-year intensity storm event for one hour. Further, as indicated in Response 4.10(d), the project site is not located within or near any production wells in the Mammoth Basin, and therefore would not deplete any existing groundwater. As such, the project would not involve the direct withdrawal of groundwater for municipal use and would not substantially interfere with recharge capabilities. Implementation of the proposed project is not anticipated to conflict with or obstruct implementation of any applicable sustainable groundwater management plan, as discussed in Response 4.10(d). Therefore, no impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

1) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact.

Construction

Soil disturbance would temporarily occur during project construction due to earth-moving activities occurring within the project site. These activities include excavation, soil compaction and moving, and grading. However, as stated in Response 4.10(a), the project would comply with the requirements of the Construction General Permit under the NPDES program for construction activities. Additionally, the project would comply with the standards outlined in Municipal Code 12.08.090, *Drainage and Erosion Design Standards*, regarding erosion and sedimentation control. The existing drainage system at the 264 Commerce Drive Site, as well as the implemented stormwater drainage system at the 59 Commerce Drive Site, would comply with erosion control and runoff quality requirements enforced by the Lahontan RWQCB, refer to Response 4.10(e). Impacts in this regard would be less than significant.

Operations

The existing project site is relatively flat with topography sloping approximately one to three percent generally from southwest to northeast. Development of the proposed project would increase the impervious surface of the 59 Commerce Drive Site, as existing gravel areas would be replaced with paved surfaces. As discussed in Response 4.10(a), implementation of the proposed infiltration system would filter any sediments or siltation on-site thereby reducing such impacts to less than significant levels. As such, impacts in this regard would be less than significant.

Project improvements are not expected to substantially increase runoff or substantially increase impervious surface at the 264 Commerce Drive Site. The existing storm drain system includes trench drains and drop inlets/dry wells to control stormwater runoff and erosion. As discussed above, the proposed project is subject to Chapter 12.08 of the Town Municipal Code which requires the facility the 20-year 1-hour storm event, estimated at 1-inch of precipitation at the site, or 1,730 cf of volume. The existing two drywells, including infiltration areas, comprise as estimated 1,300 cf of volume, slightly under the current Municipal Code. To meet current standard, the project would be required to provide an additional 430 cf of volume. As such, the project proposes to expand the existing drywells to hold an additional 468 cf of additional water storage, for a total of 1,768 cf of volume storage, which would exceed Town's current standards; refer to Appendix D. The proposed expanded drywells would also include installation of a new filter/sand-oil interceptor. Last, the project would install a new AC swale near the south end of the property to direct stormwater runoff from the site into the south drywell. As such, less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less than Significant Impact. Refer to Response 4.10(a). Drainage systems implemented by the project Applicant, at both the 59 Commerce Drive Site and 264 Commerce Drive Site, would increase

the capacity for infiltration of stormwater at the project site, compared to the existing condition. Further, it is acknowledged that implementation of the proposed project at the 264 Commerce Drive Site would not result in an increase in runoff at this location. The proposed drainage system would be required to comply with drainage design standards per Municipal Code Section 12.08.090, *Drainage and Erosion Design Standards*. As such, the project would not result in an increase in the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

3) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As indicated in Response 4.10(c)(2), post-development runoff volumes are expected to be accommodated by the proposed drainage systems. Further, as discussed in Response 4.10(a), the proposed infiltration system would increase removal of pollutants prior to discharge, compared to the existing condition. The project would be required to comply with all municipal State and Town regulations regarding erosion and pollutant runoff. As a result, project implementation would not create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

4) Impede or redirect flood flows?

Less Than Significant Impact. Refer to Responses 4.10(c)(2) and 4.10(d).

Mitigation Measures: No mitigation measures are required.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact.

Flood Hazard

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06051C1389D, the project site is located outside of the 100-year flood hazard area.[1] As a result, no impacts would occur in this regard.

[1] Federal Emergency Management Agency, *FEMA Flood Map Service Center: Search By Address*, https://msc.fema.gov/portal/search?#searchresultsanchor, accessed February 17, 2021.

Tsunami

A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of a sea floor associated with large, shallow earthquakes. The Town is located over 160 miles inland of the Pacific Ocean and is not within a tsunami flood zone. No impacts would occur in this regard.

Seiche

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. According to the National Oceanic and Atmospheric Association, seiches are typically caused when strong winds and rapid changes in atmospheric pressure push water from one end of a body of water to the other.[2] There are no water bodies in the project area that could pose a flood hazard due to a seiche. The closest lakes are Lake Mamie, Lake Mary, Lake George, Twin Lakes, and Horseshoe Lake all located in a group beginning approximately 3.28 miles the southwest of the project site. Additionally, no harbors, reservoirs, or storage tanks are located nearby that could cause inundation hazards by seiche. As such, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. The *Water Quality Control Plan for the Lahontan Region* (Water Quality Control Plan) sets forth water quality standards for the surface and ground waters of the Lahontan Region, which include both designated beneficial uses of water and the narrative and numerical objectives, which must be maintained or attained to protect those uses. The SWRCB has adopted a statewide general industrial NPDES permit which applies to facilities which discharge stormwater to surface waters either directly or though a storm drain system. The general permit does not apply to facilities which discharge stormwater to a municipal sanitary sewer system, or to facilities which discharge to evaporation ponds, percolation ponds, or dry wells where there is no discharge to surface waters under any circumstances. As such, the proposed project would discharge to the on-site drywells and/or on-site infiltration system and would not be subject to the industrial NPDES general permit.

The project site is located within the Mammoth Basin. The Mammoth Community Water District (MCWD) has published the *Groundwater Management Plan for The Mammoth Basin Watershed* (Groundwater Management Plan) dated July 2005. Per the Groundwater Management Plan, the obtainable groundwater with the basin ranges at depths between 250 to 710 feet deep. Construction activities and operations of the proposed project are not anticipated to excavate at these depths. Additionally, per Appendix D of the Groundwater Management Plan, *MCWD Production Wells within the Mammoth Basin*, the project site is not located within or near any production wells in the Mammoth Basin. The project site is situated approximately two miles east of the nearest MCWD groundwater supply well and is downstream of the directional flow of groundwater within the basin. As such, the proposed project is not

[2] National Oceanic and Atmospheric Association, *What is a Seiche?*, https://oceanservice.noaa.gov/facts/seiche.html, accessed March 9, 2020.

anticipated to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impacts are anticipated to result in this regard.

Mitigation Measures: No mitigation measures are required.

4.11 LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?				✓
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			✓	

a) Physically divide an established community?

No Impact. The project site is located within the Mammoth Lakes Business Park adjacent to other industrial businesses. Surrounding land uses include industrial uses and open space to the north; the Mammoth Community Water District's main office facilities and wastewater treatment plant and open space to the east; industrial uses, the Volcom Brothers Skate Park, and single-family residences to the south; and industrial uses, single-family residences, and open space to the west. The closest established community to the project site are the single-family residential communities to the south and west of the site. The project would primarily expand the existing transfer station building at the 59 Commerce Drive Site and relocate other Mammoth Disposal facilities between the 59 Commerce Drive Site and 264 Commerce Drive Site. All proposed development would occur within the 59 Commerce Drive Site and 264 Commerce Drive Site and would not impact or encroach into the established residential communities to the south or west. As such, project development would not physically divide an established community, and no impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact.

General Plan Consistency

Based on the *Town of Mammoth Lakes General Plan 2007* (General Plan), the entire project site (i.e., the 59 Commerce Drive and 264 Commerce Drive Sites) is designated Industrial (I). The Industrial land use designation allows a limited variety of light manufacturing and service uses that can be contained within wholly enclosed structures. The proposed expansion of the transfer station building, relocation of the buy-back/recycling center and fleet maintenance facility between the 59 Commerce Drive and 264 Commerce Drive Sites, and other site improvements are permitted under the Industrial designation.

Additionally, the entire project site is located within the Town's Industrial zoning district. According to the *Town of Mammoth Lakes Municipal Code* (Municipal Code), the Industrial zoning district is intended for viable industrial uses distanced from residential uses or other incompatible uses in order to protect

residential and commercial uses from noise, odor, dust, smoke, truck traffic, and other objectionable influences incidental to certain industrial uses. The purpose of the Industrial zoning district is also to provide an area for light industrial and limited service type uses that minimize impacts on adjacent land use patterns and the environment.

The proposed improvements to the existing transfer station and relocation of other Mammoth Disposal facilities between the 59 Commerce Drive and 264 Commerce Drive Sites are allowed within the Industrial zoning district. Table 4.11-1, *Industrial Zoning District Consistency Analysis*, analyzes the project's consistency with applicable development standards.

Table 4.11-1
Industrial Zoning District Consistency Analysis

Development Standard	Industrial (I) Zone Requirement	Proposed Project		Does Project Satisfy Requirement?
		59 Commerce Drive Site	264 Commerce Drive Site	
Lot Size	Lot Area: 8,000 square feet; Lot Area for Corner Lots: 9,000 square	81,457 square feet	23,958 square feet	Yes
	Minimum Lot Width: 75 feet	307 feet	150 feet	Yes
	Minimum Lot Depth: 100 feet	260 feet	160 feet	Yes
	Minimum Buildable Site Area: 50 square feet	81,457 square feet	23,958 square feet	Yes
	Minimum Width/Depth for a Building Site: 50 feet	307 feet	150 feet	Yes
	Maximum Slope for a Building Site: 30%	<5%	<5%	Yes
Setbacks	Front Yard to Structures: 20 feet	20 feet	95 feet	Yes
	Side Yard: 0 feet	20 feet	6 feet	Yes
	Rear Yard: 10 feet	113 feet	6 feet	Yes
Maximum Lot Coverage	100% (exclusive of snow storage easements)	93.8%; 76,337 square feet	92.6%; 22,194.6 square feet	Yes
Maximum Height	35 feet	35 feet	28 feet	Yes
Required Snow Storage Area	40% of all parking and driveway areas	22,300 square feet required, 8,625 square feet (39%) provided	2,646 square feet required, 2,920 square feet (36%) provided	Yes, upon approval of Snow Management Plans under requested Use Permits
Propane Tanks	Shall not be located in the front or street side yard setback areas; Shall be painted tan or light green	Existing tank near southeast corner of existing buy-back/recycling center building would remain; no additional tanks proposed.	Existing tank in southwest corner of site may remain; no additional tanks proposed.	Yes

Table 4.11-1, continued

Development Standard	Industrial (I) Zone Requirement	Proposed Project		Does Project Satisfy Requirement?
		59 Commerce Drive Site	264 Commerce Drive Site	
Dumpsters	Provide paved area for dumpsters and recycling containers to be readily accessible to refuse collection and recycling vehicles; Shall not be located in the front or side setback area; Shall be animal resistant.	All driveway and parking areas would be paved. Dumpsters would not be placed outdoors. Proposed 10-foot masonry wall would provide additional security for deterring animals from accessing the site.	Existing site is entirely paved, no changes proposed. Dumpsters would be situated on pavement and readily accessible to refuse collection and recycling vehicles. Further, due to the site's location, separated from public right-of-way by two other properties, dumpsters would not be readily visible from Commerce Drive.	Yes
Fence/Wall Height	8 feet; must be setback 10 feet from property line along Commerce Drive or other access way off Commerce Drive	10-foot tall split-face concrete masonry unit block wall along eastern, southern, and western boundaries	Proposed 6-foot tall masonry wall along the southern property boundary for screening and increase in height of four-foot retaining wall on the west property boundary to 6 feet for screening.	Yes, upon approval of Variance for wall height increase at 59 Commerce Drive Site
Fence Materials	Chain link is allowed for industrial uses but shall be painted or coated in a dark green, brown, or black color	Emergency chain link gate coated in either dark green, brown, or black color	6-foot tall access gate (chain link with slats) proposed at property entrance	Yes
Parking	Zone 3: 1.6 minimum spaces and 4.0 maximum spaces per 1,000 gross leasable area	23 spaces required, 27 spaces provided	11 spaces required, 14 spaces provided	Yes

Source: Town of Mammoth Lakes, Mammoth Lakes Municipal Code Section 17.28.030, *Industrial Zoning District Development Standards*.

Municipal Code Section 17.52.250, *Recycling Facilities*, provides additional development standards specific to commercial recycling facilities. Table 4.11-2, *Recycling Facilities Consistency Analysis*, analyzes the proposed buy-back/recycling center's consistency with applicable standards. As shown, the relocated buy-back/recycling center on the 264 Commerce Drive Site would be consistent with applicable standards in this regard.

Table 4.11-2
Recycling Facilities Consistency Analysis

Development Standard	Recycling Facilities Requirement	Proposed Project (264 Commerce Drive Site)	Does Project Satisfy Requirement?
General Standards			
Signage	Collection containers and reverse vending machines shall be clearly marked to identify the type of material which may be deposited, and display a notice stating that discarded material shall not be left outside of the recycling container or machine; The facility shall be clearly marked to identify the name and telephone number of the operator and the hours of operation	The buy-back/recycling center would provide collection container bins that are clearly marked to identify the type of material which may be deposited. The name and telephone number of the operator (Mammoth Disposal) and hours of operation would be identified at the site entrance.	Yes
Refuse Disposal	Facilities shall maintain adequate on-site refuse containers for the disposal of non-recyclable and non-hazardous waste materials.	Non-recyclable and non-hazardous waste materials would not be stored at the 264 Commerce Drive Site. Instead, such refuse would be transferred to the 59 Commerce Drive Site for sorting and transfer.	Yes
Large Collection Facilities/Processing Facilities Standards			
Location Requirements	The facility shall be located a minimum of 50 feet from a parcel zoned or occupied for residential use.	The closest residence to the 264 Commerce Drive Site is approximately 850 feet to the south.	Yes
Container Location	Any containers provided for "after hours" donation of recyclable materials shall be permanently located at least 100 feet from any residential zone, constructed of sturdy, rust proof or painted material, have sufficient capacity to accommodate materials collected, and be secured from unauthorized entry or removal of materials.	No containers for “after hours” donations of recyclable materials would be provided at the 264 Commerce Drive Site.	Yes
Limitation on Activities	Allowed activities are limited to baling, briquetting, compacting, crushing, grinding, shredding, and sorting of source-separated recyclable materials and repairing of reusable materials. Materials shall be shipped regularly. Transfer station facilities containing organic food waste shall be shipped daily.	Sorting, baling, loading, and compacting activities are proposed at the buy-back/recycling center. The project anticipates an average of 5 haul-out trips per day with a peak of 7 haul-out trips per day. Thus, recycled materials would be shipped off-site regularly.	Yes
Screening	The facility shall be located within an enclosed structure or an area enclosed on all sides by a solid masonry wall. The structure or enclosure shall be landscaped or screened on all sides visible from a different zoning designation or from a public street.	The buy-back/recycling center would be located within the existing 6,800-square foot building on the 264 Commerce Drive Site. The building is adjacent to other parcels zoned Industrial within the Mammoth Lakes Business Park and is setback approximately 245 feet from Commerce Drive.	Yes
Outdoor Storage	Exterior storage of material shall be in sturdy containers, bales, or enclosures that are secured and maintained in good condition. Storage shall be secure and not be visible above the height of the enclosure, solid masonry walls, or other screening methods.	As shown on Exhibit 2-6, collection bins for various recyclables are proposed along the southern portion of the 264 Commerce Drive Site. The containers would be secure and in good condition and screened from public view.	Yes

Table 4.11-2, continued

Development Standard	Recycling Facilities Requirement	Proposed Project (264 Commerce Drive Site)	Does Project Satisfy Requirement?
Operating Standards	The site shall be maintained to be clean, sanitary, and free of litter and any other undesirable materials, and shall be cleaned of loose debris on a daily basis. Dust, fumes, odor, smoke, or vibration above ambient levels shall not be detectable on adjoining parcels.	Buy-back/recycling center employees would be responsible for daily maintenance of the site to ensure the site is clean, sanitary, and free of litter/loose debris. Recycling activities associated with the buy-back/recycling center are not anticipated to generate substantial dust, fumes, odor, smoke, or vibration.	Yes

Source: Town of Mammoth Lakes, Mammoth Lakes Municipal Code Section 17.52.250, *Recycling Facilities*.

As detailed in Tables 4.11-1 and 4.11-2, the project would be consistent with applicable development standards related to the Town's Industrial zoning district and recycling facilities upon approval of the following requested entitlements:

- Use Permit UPA 20-001: For operations of the transfer station facility at the 59 Commerce Drive Site;
- Use Permit UPA 20-004: For operations of the buy-back/recycling center at the 264 Commerce Drive Site; and
- Variance VAR 20-001: For fence/wall height increase at the 59 Commerce Drive Site.

Further, the project would be subject to a Major Design Review for the proposed structures located at the 59 Commerce Drive Site. As part of the Major Design Review, the Town would review the project plans to ensure appropriate and compliant building proportions, massing, and architectural details; site design, orientation, and circulation; parking; exterior building colors and materials; fence and wall heights, materials, and colors; location and screening of mechanical equipment and refuse storage areas; exterior lighting; landscaping; and signage.

Based on the analysis above and upon approval of the requested Use Permits and Variances, the proposed project would not conflict with the General Plan or Municipal Code. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

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4.12 MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				✓
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✓

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

No Impact. According to the General Plan PEIR Figure 4.4-1, *Mineral Resources Map*, the project site does not contain mineral resources. The Town, as well as the majority of Mono County is not considered an urban/non-urban area of the State subject to mineral land classification.[1] Therefore, there are no known mineral resources in the Town that are recognized by the State. Further, since operational mining activities do not occur, nor historically took place, within the project site, project implementation would not result in the loss of availability of any mineral resources. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. Refer to Response 4.11(a). Project implementation would not result in the loss of availability of a local-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

[1] California Department of Conservation. *CGS Information Warehouse: Mineral Land Classification*, https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc, accessed February 25, 2025

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4.13 NOISE

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✓	
b. Generation of excessive groundborne vibration or groundborne noise levels?			✓	
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✓

Sound is mechanical energy transmitted by pressure waves in a compressible medium, such as air, and is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear de-emphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale (dBA) has been developed. On this scale, the human range of hearing extends from approximately three dBA to around 140 dBA.

Noise is generally defined as unwanted or excessive sound, which can vary in intensity by over one million times within the range of human hearing; therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity. Noise can be generated by a number of sources, including mobile sources (such as automobiles, trucks, and airplanes) and stationary sources (such as construction sites, machinery, and industrial operations). Noise generated by mobile sources typically attenuates (is reduced) at a rate between 3 dBA and 4.5 dBA per doubling of distance. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3 dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance. Noise generated by stationary sources typically attenuates at a rate between 6 dBA and about 7.5 dBA per doubling of distance.

There are a number of metrics used to characterize community noise exposure, which fluctuate constantly over time. One such metric, the equivalent sound level (L_{eq}), represents a constant sound that, over the specified period, has the same sound energy as the time-varying sound. Noise exposure over a longer period of time is often evaluated based on the Day-Night Sound Level (L_{dn}). This is a measure of 24-hour noise levels that incorporates a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. The penalty is intended to reflect the increased human sensitivity to noises occurring during nighttime hours, particularly at times when people are sleeping and there are lower ambient noise conditions. Typical L_{dn} noise levels for light and medium density residential areas range from 55 dBA to 65 dBA.

REGULATORY FRAMEWORK

Town of Mammoth Lakes

Municipal Code

Title 8.0, *Health and Safety,* of the Municipal Code covers all noise standards. Chapter 8.16, *Noise Regulation*, of the Municipal Code sets forth all noise regulations controlling unnecessary, excessive, and annoying noise and vibration in the Town. As outlined in Municipal Code Chapter 8.16 and indicated below in Table 4.13-1, *Exterior Noise Limits*, maximum exterior noise levels are established based on land uses.

It is noted that since there is a slight variation between the exterior noise standards in the Municipal Code and the General Plan's Noise Element, adopted in 1997, the Town defers to the standards noted in the Municipal Code. The Municipal Code standards are more recent and remain the standard until the Town can update the General Plan Noise Element to be consistent.

Table 4.13-1
Exterior Noise Limits

Receiving Land Use Category	Time Period	Rural/Suburban	Suburban	Urban
One and Two Family Residential	10 p.m. – 7 a.m.	40	45	50
	7 a.m. – 10 p.m.	50	55	60
Multi-Family Dwelling Residential	10 p.m. – 7 a.m.	45	50	55
	7 a.m. – 10 p.m.	50	55	60
Limited Commercial Some Multiple Dwellings	10 p.m. – 7 a.m.	55		
	7 a.m. – 10 p.m.	60		
Commercial	10 p.m. – 7 a.m.	60		
	7 a.m. – 10 p.m.	65		
Light Industrial	Anytime	70		
Heavy Industrial	Anytime	75		

Notes:
1. Levels are not to be exceeded more than thirty minutes in any hour.
2. The classification of different areas of the community in terms of environmental noise zones shall be determined by the noise control officer, based upon assessment of community noise survey data. Additional area classifications should be used as appropriate to reflect both lower and higher existing ambient levels than those shown. Industrial noise limits are intended primarily for use at the boundary of industrial zones rather than for noise reduction within the zone.

Source: Town of Mammoth Lakes, *Municipal Code*, *Chapter 8.16*, *Noise Regulation, Table 1, Exterior Noise Limits.*

The following is taken from the Municipal Code*:*

Section 8.16.070 Exterior noise limits

A. The noise standards for the various categories of land use identified by the noise control officer as presented in Table 1 (refer to Table 4.13-1) *shall, unless otherwise specifically indicated, apply to all such property within a designated zone.*

B. No person shall operate or cause to be operated any source of sound at any location within the town or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person, which causes the noise level when measured on any other property to exceed:

1. The noise standard for that land use as in Table 1 (refer to Table 4.13-1) *for a cumulative period of more than thirty minutes in any hour; or*

2. The noise standard plus five dB for a cumulative period of more than fifteen minutes in any hour; or

3. The noise standard plus ten dB for a cumulative period of more than five minutes in any hour; or

4. The noise standard plus fifteen dB for a cumulative period of more than one minute in any hour; or

5. The noise standard plus twenty dB or the maximum measured ambient level, for any period of time.

C. If the measured ambient level differs from that permissible within any of the first four noise limit categories above the allowable noise exposure standard shall be adjusted in five dB increments in each category as appropriate to encompass or reflect the ambient noise level.

D. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under this category shall be increased to reflect the maximum ambient noise level.

E. If the measurement location is on a boundary between two different zones, the noise level applicable to the lower noise zone plus five dB, shall apply.

F. If possible, the ambient noise shall be measured at the same location along the property line utilized in subsection B of this section with the alleged offending noise source inoperative. If for any reason the alleged offending noise source cannot be shut down, the ambient noise must be estimated by performing a measurement in the same general area of the source but at a sufficient distance such that the noise from the source is at least ten dB below the ambient in order that only the ambient level is measured. If the difference between the ambient and the noise source is five to ten dB, then the level the ambient itself can be reasonably determined by subtracting a one decibel correction to account for the contribution of the source.

G. In the event the alleged offensive noise, as judged by the noise control officer, contains a steady, audible tone such as a whine, screech, or hum, or is a repetitive noise such as hammering or riveting, or contains music or speech conveying informational content, the standard limits set forth in Table 1 (refer to Table 4.13-1) *shall be reduced by five dB.*

Additionally, the Municipal Code states the following regarding applicable interior noise standards:

Section 8.16.080 Interior noise standards

A. Interior noise standards for multifamily residential dwellings as presented in Table 2 (refer to Table 4.13-2, *Interior Noise Limits*) *shall apply, unless otherwise specifically indicated, within all such dwellings with windows in their normal seasonal configuration.*

Table 4.13-2
Interior Noise Limits

Noise Zone	Type of Land Use	Time Interval	Allowable Interior Noise Level
All	Multifamily Residential	10 p.m. – 7 a.m.	35
		7 a.m. – 10 p.m.	45

Source: Town of Mammoth Lakes, *Municipal Code, Chapter 8.16, Noise Regulation, Table 2, Interior Noise Standards.*

B. No person shall operate, or cause to be operated within a dwelling unit, any source of sound or allow the creation of any noise which causes the noise level when measured inside a neighboring receiving dwelling unit to exceed:

1. The noise standard as specified in Table 2 for a cumulative period of more than five (5) minutes in any hour; or

2. The noise standard plus five decibels (5 dB) for a cumulative period of more than one minute in any hour; or

3. The noise standard plus ten decibels (10 dB) or the maximum measured ambient, for any period of time.

C. If the measured ambient level differs from that permissible within any of the noise limit categories above, the allowable noise exposure standard shall be adjusted in five decibel (5 dB) increments in each category as appropriate to reflect the ambient noise level.

D. In the event the alleged offensive noise, as judged by the noise control officer, contains a steady, audible tone such as a whine, screech, or hum, or is a repetitive noise such as hammering or riveting, or contains music or speech conveying informational content, the standard limits set forth in Table 2 (refer to Table 4.13-2) *shall be reduced by five dB.*

In addition to interior and exterior noise standards, the Town provides regulations for construction activities and other types of noises in Section 8.16.090, *Prohibited Acts*, of the Municipal Code. The following noise regulations were taken from Municipal Code Section 8.16.090 for regulations relevant to the proposed project:

Section 8.16.090 Prohibited acts

B. *The following acts, and the causing or permitting thereof, are declared to be in violation of this chapter:*

5. *Loading, unloading, opening, closing or other handling of boxes, crates, containers, building materials, garbage cans, or similar objects between the hours of ten p.m. and seven a.m. in such a manner as to cause a noise disturbance across a residential real property line or at any time to violate the provisions of this section.*

6. *Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work is subject to the hours of work permitted by this code, except for emergency work of public service agencies.*

    a. *At residential properties:*

        i. *Mobile equipment: Maximum noise levels for nonscheduled, intermittent, short-term operation (less than ten days) of mobile equipment* (refer to Table 4.13-3, *Maximum Noise Levels for Short-Term Mobile Equipment Noise*).

Table 4.13-3
Maximum Noise Levels for Short-Term Mobile Equipment Noise

Acceptable Hours Operation	Type I Areas Single-Family Residential	Type II Areas Multi-Family Residential	Type III Areas Semi-Residential Commercial
Daily, except Sundays and legal holidays 7 a.m. to 8 p.m.	75 dBA	80 dBA	85 dBA
Daily, 8 p.m. to 7 a.m. and all day Sundays and legal holidays	60 dBA	65 dBA	70 dBA
Source: Town of Mammoth Lakes, *Municipal Code*, *Chapter 8.16*, *Noise Regulation*.			

        ii. *Stationary equipment: Maximum noise levels for repetitively scheduled and relatively long-term operation (periods of ten days or more) of stationary equipment* (refer to Table 4.13-4, *Maximum Noise Levels for Long-Term Stationary Equipment Noise*).

Table 4.13-4
Maximum Noise Levels for Long-Term Stationary Equipment Noise

Acceptable Hours Operation	Type I Areas Single-Family Residential	Type II Areas Multi-Family/Residential	Type III Areas Semi-Residential/ Commercial
Daily, except Sundays and legal holidays 7 a.m. to 8 p.m.	60 dBA	65 dBA	70 dBA
Daily, 8 p.m. to 7 a.m. and all day Sundays and legal holidays	50 dBA	55 dBA	60 dBA
Source: Town of Mammoth Lakes, *Municipal Code*, *Chapter 8.16*, *Noise Regulation*.			

General Plan

The Noise Element of the General Plan provides a framework for addressing potential noise impacts and prevention of noise conflicts with noise sources within the Town. Additionally, the Community Design Element of the General Plan includes several polices to address potential noise impacts from a land use perspective.

The following goals, policies, and actions taken from the General Plan are relevant to the proposed project.

COMMUNITY DESIGN ELEMENT

Goal C.6. Enhance community character by minimizing exposure to noise by ensuring compatible land uses around noise sources.

Policy C.6.A. Minimize community exposure to noise by ensuring compatible land uses around noise sources.

Policy C.6.B. Allow development only if consistent with the Noise Element and the policies of this Element. Measure noise use for establishing compatibility in dBA CNEL and based on worst-case noise levels, either existing or future, with future noise levels to be predicted based on projected 2025 levels.

Policy C.6.C. Development of noise-sensitive land uses shall not be permitted in areas where the noise level from existing stationary noise sources exceeds the noise level standards described in the Noise Element.

Policy C.6.D. Require development to mitigate exterior noise to "normally acceptable" levels in outdoor areas.

Action C.6.D.1. Assess existing sources of outdoor noise and develop criteria and standards for outdoor noise.

Policy C.6.E. Address noise issues through the planning and permitting process.

Policy C.6.F. Require mitigation of all significant noise impacts as a condition of project approval.

Policy C.6.G. Require preparation of a noise analysis or acoustical study, which is to include recommendations for mitigation, for all proposed projects that may result in potentially significant noise impacts.

Action C.6.G.1. Adopt significance thresholds to be used to assess noise impacts for projects reviewed under the CEQA process and develop a list of acceptable mitigations that might be applied to mitigate noise impacts to acceptable levels, including specific guidelines for their implementation.

Action C.6.G.2. Adopt criteria and location maps that specify the locations and circumstances under which a noise analysis or acoustical study will need to be prepared for a proposed project. Develop guidelines for conducting such studies.

NOISE ELEMENT

It is noted that the Noise Element is structured differently when compared to other elements in the General Plan. Goals in this Noise Element cover the overarching theme of noise conflict while policies and implementation measures (referred to as "actions" in other elements) provide practical directions to achieve the objectives outlined in the goals.

Goals

Goal N.1. To protect the citizens of the Town from the harmful and annoying effects of exposure to excessive noise.

Goal N.2. To protect the economic base of the Town by preventing incompatible land uses from encroaching upon existing or planned noise-producing uses.

Goal N.3. To preserve the tranquility of residential areas by preventing noise-producing uses from encroaching upon existing or planned noise-sensitive uses.

Goal N.4. To preserve the citizens of the Town concerning the effects of exposure to excessive noise and the methods available for minimizing such exposure.

Policies

Prevention of Adverse Noise Impacts due to Transportation Noise Sources:

Policy N.1 New development of noise-sensitive land uses shall not be permitted in areas exposed to existing or projected future levels of noise from transportation noise sources which exceed 60 dB Ldn outdoor activity areas or 45 dB Ldn in interior spaces.

Policy N.2 Noise created by new transportation noise sources, including roadway improvement projects, shall be mitigated so as not to exceed 60 dB Ldn within outdoor activity areas and 45 dB Ldn within interior spaces of existing noise sensitive land uses.

Prevention of Adverse Noise Impacts due to Stationary Noise Sources:

Policy N.3 New development of noise-sensitive land uses shall not be permitted where the noise level from existing stationary noise sources exceeds the noise level standards of Table 3 (refer to Table 4.13-5, *Maximum Allowable Noise Exposure for Stationary Noise Sources*).

Table 4.13-5
Maximum Allowable Noise Exposure for Stationary Noise Sources

Level	Daytime (7 a.m. to 10 p.m.)	Nighttime (10 p.m. to 7 a.m.)
Hourly Level, dB[1]	50	45
Maximum Level, dB[1]	70	65

Note:
1. As determined at the property line of the receiving land use. When determining the effectiveness of noise mitigation measures, the standards may be applied on the receptor side of noise barriers or other property line noise mitigation measures.

Source: Town of Mammoth Lakes, *General Plan, Noise Element, Table 3, Maximum Allowable Noise Exposure Stationary Noise Sources. 2007*.

Policy N.4 Noise created by proposed stationary noise sources or existing stationary noise sources which undergo modifications that may increase noise levels shall be mitigated so as not to exceed the noise level standards of Table 3 (refer to Table 4.13-5).

Implementation Measures

N.1. The Town shall review new public and private development proposals to determine conformance with the policies of this Noise Element.

N.2. The Town shall require an acoustical analysis in those cases where a project potentially threatens to expose noise-sensitive land uses to excessive noise levels. The presumption of excessive noise levels shall be based on the location of new noise sensitive uses to known noise sources (see Table I and Noise Contour Maps on file with the Town of Mammoth Lakes), or staff's professional judgement that a potential for adverse noise impacts exists. Acoustical analyses shall be required early in the review process so that noise mitigation may be included in the project design. For development not subject to environmental review, the requirements for an acoustical analysis shall be implemented prior to the issuance of building permits. The requirements for the content of an acoustical analysis are given in Appendix B of the Noise Element.

N.3. The Town shall develop and employ procedures to ensure that noise mitigation measures required pursuant to an acoustical analysis are implemented in the development review and building permit process.

N.4. The Town shall develop and employ procedures to monitor compliance with the policies of the Noise Elements after completion of projects where noise mitigation measures have been required.

N.5. The Town shall enforce the State Noise Insulation Standards (California Code of Regulations, Title 24) and Chapter 35 of the Uniform Building Code (UBC) concerning interior noise exposure for multi-family housing, hotels and motels.

N.8. The Town shall revise its noise ordinance so that its noise limits are consistent with those of the Noise Element, the language of the noise ordinance is clear and

concise, and that potential noise nuisances that are unique to the Town, such as snow making equipment, are appropriately regulated.

EXISTING CONDITIONS

Existing Stationary Sources

The primary sources of stationary noise in the project vicinity are those associated with the operations of adjacent industrial uses to the north; public utilities and office uses to the east; industrial, recreational, and residential uses to the south; and industrial, residential, and institutional uses to the west. The noise associated with these sources may represent a single-event noise occurrence, short-term, or long-term/continuous noise.

Existing Mobile Sources

In order to assess the potential for mobile source noise impacts, it is necessary to determine the noise currently generated by vehicles traveling through the project area. The majority of the existing noise in the project area is generated from trucks traveling through the 59 Commerce Drive Site (developed with a transfer station, buy-back/recycling center, and company office) and the 264 Commerce Drive Site (developed with a vehicular fleet maintenance facility) and vehicle sources along Meridian Boulevard and Commerce Drive.

Existing Sensitive Receptors

Noise-sensitive receptors are generally defined as locations where people reside or where the presence of unwanted sound may adversely affect the use of the land. Certain land uses are particularly sensitive to noise, including schools, libraries, hospitals, rest homes, long-term medical and mental care facilities, and passive recreational uses. Residential areas are also considered noise sensitive, especially during the nighttime hours. Existing sensitive receptors located in the project vicinity include residential uses (single-family residences) to the south and west, and institutional uses (Mammoth Elementary School) approximately 1,560 feet to the southwest.[1]

Existing Noise Conditions

In order to quantify existing ambient noise levels in the project area, four noise measurements were taken on March 1, 2021; refer to Table 4.13-6, *Noise Measurements*. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the project site. Ten-minute measurements were taken between 2:00 p.m. and 4:00 p.m. Short-term (L_{eq}) measurements are considered representative of the noise levels throughout the day.

Meteorological conditions were partly cloudy, cool temperatures (between 48 to 52 degrees Fahrenheit) with light wind speeds (0 to 5 miles per hour). Noise monitoring equipment used for the ambient noise survey consisted of a Brüel & Kjær Hand-held Analyzer Type 2250 equipped with a Type 4189 pre-polarized microphone. The monitoring equipment complies with applicable requirements of the American National Standards Institute (ANSI) for sound level meters. As shown in Table 4.13-6, the ambient recorded noise

[1] Although the Volcom Brothers Skate Park is located approximately 180 feet to the south of the project site, skate parks are considered active recreational uses. Therefore, the Volcom Brothers Skate Park is not identified as a sensitive receptor in this analysis.

levels in the project vicinity ranged between 45 dBA L_{eq} and 67.8 dBA L_{eq}. The results of the field measurements are included in Appendix E, *Noise Data*.

Table 4.13-6
Noise Measurements

Measurement Location	Location	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Peak (dBA)	Time
#1	Adjacent to the existing Recycling Facility receiving area within the 59 Commerce Drive Site	67.8	48.8	88.2	105.4	2:10 p.m. – 2:20 p.m.
#2	East of 519 Wagon Wheel Road	51.5	38.4	73.0	87.0	2:54 p.m. – 3:04 p.m.
#3	Wagon Wheel Road/Wagon Road	45.0	36.9	56.1	61.2	3:08 p.m. – 3:18 p.m.
#4	Mammoth Elementary School	51.0	41.4	63.2	93.4	3:23 p.m. – 3:33 p.m.

Source: Michael Baker International, March 1, 2021 (refer to Appendix E, *Noise Data*).

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. It is difficult to specify noise levels that are generally acceptable to everyone; noise that is considered a nuisance to one person may be unnoticed by another. Standards may be based on documented complaints in response to documented noise levels or based on studies of the ability of people to sleep, talk, or work under various noise conditions.

Construction

The project involves construction activities associated with demolition, grading, paving, construction, and architectural coating applications at the 59 Commerce Drive Site, and mostly non-structural improvements at the 264 Commerce Drive Site. The project would be constructed over approximately 14 months, assuming that construction and improvements at both sites would be concurrent as a conservative analysis. It is anticipated that approximately 2,000 cubic yards of soil would be exported from the site for off-site disposal. The highest levels of construction-related noise impacts would typically occur during the initial demolition and earthwork phases. Typical noise levels generated by construction equipment are shown in Table 4.13-7, *Maximum Noise Levels Generated by Typical Construction Equipment*. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

Construction noise impacts generally happen when construction activities occur in areas immediately adjoining noise sensitive land uses, during noise sensitive times of the day, or when construction activity occurs at the same precise location over an extended period of time. The Town provides regulations for

construction activities and other types of noises in Municipal Code Section 8.16.090. Specifically, pursuant to Municipal Code Section 8.16.090, the maximum exterior noise levels allowed in single-family residential areas for mobile (e.g., excavator, backhoe, dozer, loader, etc.) and stationary equipment (e.g., generators, compressors, pumps, etc.) from 7:00 a.m. to 8:00 p.m. Monday through Saturday are 75 dBA and 60 dBA, respectively; refer to Tables 4.13-3 and 4.13-4.

Table 4.13-7
Maximum Noise Levels Generated by Typical Construction Equipment

Type of Equipment	Acoustical Use Factor[1]	L_{max} at 540 Feet (dBA)
Crane	16	60
Concrete Mixer Truck	40	58
Backhoe	40	57
Dozer	40	61
Excavator	40	60
Forklift	40	57
Paver	50	56
Roller	20	59
Tractor	40	63
Water Truck	40	59
Grader	40	64
General Industrial Equipment	50	64

Note: dBA = A-weighted decibels.
1. Acoustical Use Factor (percent): Estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation.

Source: Federal Highway Administration, *Roadway Construction Noise Model (FHWA-HEP-05-054), Table 7-1*, September 2018.

The closest sensitive receptors are the single-family residences located to the southwest of the project site (i.e., 59 Commerce Drive Site), approximately 540 feet from the nearest construction area (i.e., proposed paved area) on the project site.[2] At this distance, the maximum noise levels generated by project construction equipment would be approximately 64 dBA. However, an intervening structure is located between the project site and the nearest sensitive receptor. Accounting for noise shielding provided by the intervening structure, the maximum noise level from construction equipment would be approximately 59.5 dBA.[3] Therefore, construction noise levels would be below the Town's daytime maximum allowable exterior noise level from stationary equipment (60 dBA) and mobile equipment (i.e., 75 dBA) at single-family residential uses during construction.

Construction would occur between the hours of 7:00 a.m. and 8:00 p.m. Monday through Saturday. Further, grading and other construction would occur throughout the project site and would not be concentrated in or confined to one specific area of the project site. Construction noise from grading operations would be acoustically dispersed throughout the project site and not concentrated in one area. Construction activities in any one area would be temporary and intermittent, and therefore not occur in any one particular area for the entire construction duration. The shielding of buildings and other barriers that interrupt line-of-sight conditions would further reduce noise levels from point sources.

[2] The nearest sensitive receptor is a residence located at 519 Wagon Wheel Road.

[3] U.S. Department of Transportation Federal Highway Administration, *Noise Measurement Handbook – Final Report*, updated August 7, 2018, https://www.fhwa.dot.gov/ENVIRonment/noise/measurement/handbook.cfm, accessed March 8, 2021.

Adherence to the permitted hours of construction are required in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant disruption. Thus, a less than significant noise impact would result from construction activities.

Operations

The project proposes to 1) expand the existing transfer station at the 59 Commerce Drive Site, 2) relocate the buy-back/recycling center (currently at the 59 Commerce Drive Site) to the 264 Commerce Drive Site, and 3) relocate the fleet maintenance operations (currently at the 264 Commerce Drive Site) to the 59 Commerce Drive Site. Both the transfer station and buy-back/recycling center areas would be open from 6:30 a.m. to 9:00 p.m. seven days a week. The fleet maintenance facility is currently open from 6:30 a.m. to 5:00 p.m. Monday through Friday, depending on snow conditions and other needs when mechanic support is required outside of these hours. On-site staff for the expanded transfer station facility would include approximately 25 employees (five employees for the transfer station, six employees in the office, and 14 employees for the fleet maintenance facility consisting of two mechanics and 12 drivers). In total, the project would result in three net new employees, two additional employees staffed at the transfer station and one additional employee staffed at the buy-back/recycling center.

Mobile Noise

Future development generated by the proposed project would result in additional traffic on adjacent roadways, thereby increasing vehicular noise in the vicinity of existing and proposed land uses. According to the *Highway Traffic Noise Analysis and Abatement Policy and Guidance*, a doubling of traffic volumes would result in a 3 dB increase in traffic noise levels, which is barely detectable by the human ear.[4] Based on the *Mammoth Disposal Transportation Analysis* (Transportation Analysis) prepared by LSC Transportation Consultants, Inc. (dated April 1, 2021), the existing project site generates approximately 504 daily trips and the proposed project is projected to generate a total of approximately 692 daily one-way trips to generate approximately 346 round trips, for a total of 692 daily one-way trips. Therefore, the proposed project would result in a net increase of 188 daily trips when compared to existing conditions. Table 4.13-8, *Existing and Project Traffic Volumes*, provides existing and project generated peak hour traffic volumes in the project vicinity. As shown in Table 4.13-8, project generated peak hour traffic volumes would not double existing peak hour traffic volumes, and any increase in traffic noise along local roadways would be imperceptible. Impacts would be less than significant in this regard.

[4] U.S. Department of Transportation, *Highway Traffic Noise Analysis and Abatement Policy and Guidance*, https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm, August 24, 2017, accessed February 22, 2021.

Table 4.13-8
Existing and Project Peak Hour Traffic Volumes

Segment	Existing Peak Hour Traffic Volumes	Project Peak Hour Traffic Volumes	Doubling of Traffic Volumes?
Meridian Boulevard / Highway 203 Eastbound	811	18	No
Meridian Boulevard / Highway 203 Westbound	592	9	No
Meridian Boulevard / Commerce Drive	425	18	No
Meridian Boulevard / Old Mammoth Road	1,898	0	No

Source: LSC Transportation Consultants, Inc., *Mammoth Disposal Transportation Analysis*, dated February 22, 2021.

Further, municipal solid waste from the Town of Mammoth Lakes and surrounding communities is currently disposed of at the Benton Crossing Landfill, located in unincorporated Mono County approximately 9.5 miles northeast of the Town, either directly by individual patrons or via Mammoth Disposal route trucks. As the Benton Crossing Landfill is anticipated to reach capacity and will stop receiving waste by January 1, 2023, municipal solid waste will have to be transported to other landfill facilities located further from waste source locations (refer to Exhibit 2-1, *Regional Vicinity*).

The purpose of the proposed project is to increase handling volume capacity for municipal solid waste at the existing Town of Mammoth Lakes Mammoth Disposal Transfer Station such that individual patrons and route trucks from Mammoth Lakes and the surrounding community can dispose of waste at the transfer station (closer to the waste source locations). The municipal solid waste would then be sorted, compacted, and consolidated at the transfer station into haul trucks (larger than the facility is currently capable of handling) for transporting to an off-site landfill facility in lieu of individual patron or route truck trips, thus resulting in fewer vehicle miles travelled (VMT) for trips accessing the surrounding vicinity.

Stationary Noise

Stationary noise sources associated with the proposed project would include those typical of light industrial uses (e.g., operation of heavy machinery, slow-moving trucks, mechanical equipment, parking areas, and landscaping equipment). These noise sources are typically intermittent and short in duration and would be comparable to existing sources of noise experienced in the site vicinity. Further, all stationary noise activities would be required to comply with the Town's Municipal Code requirements pertaining to noise attenuation. Each stationary noise source is discussed below.

Heavy Machinery and Slow-Moving Trucks

Noise-generating activities associated with the buy-back/recycling center include operation of heavy machinery (i.e., forklifts and frontend loaders) and slow-moving trucks, as well as clashing of recyclables. On March 1, 2021, Michael Baker conducted existing ambient noise measurements immediately adjacent to the existing buy-back/recycling center and the residence located at 519 Wagon Wheel Road (i.e., nearest sensitive receptor to the existing facility); refer to noise measurement locations #1 and #2 in Table 4.13-6. As shown in Table 4.13-6, the existing 59 Commerce Drive Site buy-back/recycling center generates operational noise levels of approximately 67.8 dBA. Accounting for the 59 Commerce Drive Site buy-back/recycling center operational noise levels, the 519 Wagon Wheel Road residence currently experiences existing ambient noise levels of approximately 51.5 dBA. The 519 Wagon Wheel Road residence is located approximately 770 feet southwest of the noise measurement location situated adjacent to the 59 Commerce

Drive Site buy-back/recycling center. Accounting for intervening structures and vegetation, noise levels generated at the existing 59 Commerce Drive Site buy-back/recycling center would be attenuated by approximately 16.3 dBA at the 519 Wagon Wheel Road residence. It should be noted that the fleet maintenance facility would be relocated from the 264 Commerce Drive Site to the 59 Commerce Drive Site. However, noise-generating activities at the fleet maintenance facility would include slow-moving trucks which is already a source of noise at the existing 59 Commerce Drive Site. As such, the proposed fleet maintenance facility would not increase existing ambient noise levels.

The project proposes to relocate the buy-back/recycling center from the 59 Commerce Drive Site to the 264 Commerce Drive Site. The nearest sensitive receptor to this facility (i.e., a residence located at 393 Wagon Wheel Road) is located approximately 800 feet from the proposed buy-back/recycling center at the 264 Commerce Drive Site. Intervening structures and vegetation between the 264 Commerce Drive Site and the 393 Wagon Wheel Road residence would be similar to the intervening structures and vegetation between the 59 Commerce Drive Site and the 519 Wagon Wheel Road residence. As the 519 Wagon Wheel Road residence is located closer to the existing buy-back/recycling center (59 Commerce Drive Site) when compared to the distance from the 393 Wagon Wheel Road residence to the proposed buy-back/recycling center (264 Commerce Drive Site), it can be reasonably inferred that noise levels would be lower than 51.5 dBA. Therefore, the Town's suburban residential exterior daytime (55 dBA) noise standard per Municipal Code Section 8.16.070 would not be exceeded as a result of buy-back/recycling center operations at the project site. Further, the operations at the proposed buy-back/recycling center would be similar to the existing buy-back/recycling center, and thus would not introduce a new source of noise to the site vicinity. As such, impacts would be less than significant in this regard.

Mechanical Equipment

The project would include heating, ventilation, and air conditioning (HVAC) units located at the exterior of the proposed office building, and adjacent to the scale house on the ground level. HVAC units typically generate noise levels of approximately 52 dBA L_{eq} at 50 feet from the source.[5] The closest HVAC unit would be located approximately 700 feet from the nearest sensitive receptor (i.e. residential use) to the southwest.[6] HVAC noise levels at this distance would be approximately 29 dBA. Therefore, the Town's suburban residential exterior daytime (55 dBA) and nighttime (45 dBA) noise standards per Municipal Code Section 8.16.070 would not be exceeded as a result of HVAC stationary noise at the project site. Impacts would be less than significant in this regard.

Parking Areas

Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. However, the instantaneous maximum sound levels generated by a car door slamming, engines starting up and car pass-bys may be an annoyance to adjacent noise-sensitive receptors. Estimates of the maximum noise levels associated with some parking lot activities are presented in Table 4.13-9, *Typical Noise Levels Generated by Parking Lots*.

[5] Berger, Elliott H., et al., *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 6, 2010.
[6] The nearest sensitive receptor is a residence located at 519 Wagon Wheel Road.

Table 4.13-9
Typical Noise Levels Generated by Parking Lots

Noise Source	Maximum Noise Levels at 50 Feet from Source
Car door slamming	61 dBA L_{eq}
Car starting	60 dBA L_{eq}
Car idling	53 dBA L_{eq}
Source: Kariel, H. G., Noise in Rural Recreational Environments, Canadian Acoustics 19(5), 3-10, 1991.	

The project would provide 27 on-site parking spaces. It should be noted that parking lot noise is an instantaneous noise level compared to noise standards in the CNEL scale, which are averaged over time. As a result, actual noise levels over time resulting from parking lot activities would be far lower than what is identified in Table 4.13-9. Additionally, parking lot noise currently exists within the surface parking lots on-site. Therefore, the proposed parking activities would not result in substantially greater noise levels than currently exist in the vicinity. Noise associated with parking lot activities is not anticipated to exceed the Town's Noise Standards during operation. Therefore, noise impacts from parking lots would be less than significant.

Mitigation Measures: No mitigation measures are required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Operation of the project would not generate substantial levels of vibration due to the lack of vibration-generating sources and therefore is not analyzed. Conversely, project construction can generate varying degrees of groundborne vibration, depending on the construction phase and equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source; refer to Table 4.13-10, *Typical Vibration Levels for Construction Equipment*. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

The Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment Manual* identifies various vibration damage criteria for different building classes. This evaluation uses the architectural damage threshold for continuous vibrations at engineered concrete and masonry buildings of 0.3 inch-per-second peak particle velocity (PPV). As the nearest structures to project construction areas are industrial and commercial buildings, this threshold is considered appropriate. The types of construction vibration impact include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural.

Table 4.13-10
Typical Vibration Levels for Construction Equipment

Equipment	Approximate peak particle velocity at 25 feet (inches/second)[1]	Approximate peak particle velocity at 52 feet (inches/second)[1]
Vibratory Roller	0.210	0.070
Large bulldozer	0.089	0.030
Loaded trucks	0.076	0.025
Jackhammer	0.035	0.012
Small bulldozer	0.003	0.001

Note:
1) Calculated using the following formula: PPV (equip) = PPV (ref) x (25/D)1.5
where: PPV (equip) = the peak particle velocity in in/sec of the equipment adjusted for the distance
PPV (ref) = the reference vibration level in in/sec from Table 7-4 of the FTA Transit Noise and Vibration Impact Assessment Manual
D = the distance from the equipment to the receiver

Source: Federal Highway Administration, *Transit Noise and Vibration Impact Assessment Manual*, Table 7-4, September 2018.

The highest degree of groundborne vibration would be generated during the paving construction phase due to the operation of a vibratory roller. Based on the Federal Transit Administration (FTA) data, vibration velocities from vibratory roller operations would be 0.21 inch-per-second PPV at 25 feet from the source of activity.[7] The 264 Commerce Drive Site would not include major physical improvements to the building or paved area . Minor excavation activities would occur for the expansion of the two existing drywells and installation footings to support a new perimeter wall along the southern boundary. Equipment associated with these activities would not likely include equipment associated with potential vibration impacts. Therefore, for the purposes of this analysis construction activities at the 59 Commerce Drive Site are specifically considered, since these construction activities could involve use of vibratory roller operations. The nearest structure to project construction activities is located approximately 52 feet to the north of the 59 Commerce Drive Site. At this distance, groundborne vibrations generated from vibratory roller operations would be approximately 0.070 inch-per-second PPV. As such, construction activities would not cause groundborne vibration above the FTA significance threshold and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The closest airport to the project site is the Mammoth Yosemite Airport, located approximately 4.8 miles east of the site at 1300 Airport Road. According to the *Mammoth Yosemite Airport - ALUC Airport Safety Zone Plan/Land Use Plan (Existing Runway)* map, the project site is not located within any airport safety zones established for the Mammoth Yosemite Airport, or within an airport land use plan.[8] Further, based on distance to the closest airport, project implementation would not result in excessive noise for people residing or working in the project area. No impacts would occur in this regard.

[7] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

[8] Town of Mammoth Lakes, *Mammoth Yosemite Airport - ALUC Airport Safety Zone Plan/Land Use Plan (Existing Runway)*, https://www.ci.mammoth-lakes.ca.us/DocumentCenter/View/4802, July 24, 2014.

Mitigation Measures: No mitigation measures are required.

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4.14 POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			✓	
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				✓

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. A project could induce population growth in an area either directly, through the development of new residences or businesses, or indirectly, through the extension of roads or other infrastructure. As described in Section 2.0, *Project Description*, the project would involve 1) expanding the existing transfer station at the 59 Commerce Drive Site, 2) relocating the buy-back/recycling center (currently at the 59 Commerce Drive Site) to the 264 Commerce Drive Site, and 3) relocating the fleet maintenance facility (currently at the 264 Commerce Drive Site) to the 59 Commerce Drive Site. No new residences, businesses, or extensions of roads or other infrastructure are proposed that may directly or indirectly induce substantial population growth. Compared to existing conditions, the project would result in three net new employees, two additional employees staffed at the transfer station and one additional employee staffed at the buy-back/recycling center. The three net new jobs generated by the project is a nominal amount that would not result in substantial population growth in the Town. Additionally, it is likely that these jobs would be filled by workers already living within the Town. As such, impacts would be less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. The 59 Commerce Drive Site is currently developed as a solid waste transfer station and buy-back/recycling center, and the 264 Commerce Drive Site is developed as a fleet maintenance facility. There are currently no residences on-site. Thus, project development would not displace any existing housing or residents. No impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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4.15 PUBLIC SERVICES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1) Fire protection?			✓	
2) Police protection?			✓	
3) Schools?			✓	
4) Parks?			✓	
5) Other public facilities?			✓	

Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i. Fire protection?

***Less Than Significant Impact*.** The Mammoth Lakes Fire Protection District (MLFPD) provides fire protection and emergency response services for the Town of Mammoth Lakes and would serve the project site. Currently, two MLFPD fire stations serve the Town of Mammoth Lakes. The closest station to the project site is MLFPD's primary station, Fire Station No. 1, located approximately 0.8-mile to the northwest the project site at 3150 Main Street.[1] Fire Station No. 2 is located at 1574 Old Mammoth Road, located approximately 2.3 miles to the southwest of the project site.

Construction

The project does not involve the construction of any new or physically altered fire protection facilities. Construction activities would be subject to compliance with applicable State and local regulations to reduce risk of fire, including installation of temporary construction fencing to restrict site access. Specifically, project construction would be subject to compliance with Municipal Code Title 15, *Buildings and Construction*, which adopts by reference the 2019 Edition of the California Building Code, which includes site access requirements and fire safety precautions. Construction-related impacts concerning fire protection services would be less than significant in this regard.

[1] Mammoth Lakes Fire Protection District, *Operations Division,* https://mlfd.ca.gov/about/operations/, accessed February 25, 2021.

Operations

Project operations are not anticipated to restrict access to the project site. The project is not anticipated to result in increased response times to the project site or surrounding vicinity or require the construction of new or physically altered fire protection facilities, as the proposed operations are associated with an existing facility and two existing MLFPD fire stations are located within two miles of the project site. Further, any increase in project demands would be offset through payment of relevant development impact fees and through property, sales, and utility taxes paid to the Town's General Fund. The project proposes the installation of a new 4-inch lateral connection near the street side of the new office building for a Fire Department Connection (FDC) and a fire sprinkler system at the 59 Commerce Drive Site. The project would utilize the existing fire sprinkler system at the 264 Commerce Drive Site. Additionally, the project would construct a 30-foot wide secondary gate for emergency access. The gate would be accessible for first responders from the adjacent alley and would include a 10-foot tall chain link fence. The project would be subject to compliance with Municipal Code Title 15, *Buildings and Construction*, which adopts by reference the 2019 Edition of the California Fire Code. The 2019 Edition of the California Fire Code includes fire-safety related building standards for new construction. The project would be subject to review by the MLFPD to ensure that the project complies with fire requirements, including approval of proposed emergency access points. Following compliance with the Municipal Code Title 15 and MLFPD fire requirements, operational impacts concerning fire protection services would be less than significant.

Mitigation Measures: No mitigation measures are required.

ii. Police protection?

Less Than Significant Impact. The Mammoth Lakes Police Department (MLPD), Mono County Sheriff's Department (MCSD), and the California Highway Patrol (CHP) provide police protection and law enforcement services for the Town. MLPD provides all police services for the project area and operates approximately 1.1 miles to the northwest of the project site at 58 Thompson Way. Mammoth Lakes is currently served by approximately 12 sworn officers and three civilian employees.[2]

Construction

The project does not involve the construction of any new or physically altered police protection facilities. Construction activities would be subject to compliance with all applicable local regulations in place to reduce impacts to police protection services. Specifically, project construction would be subject to compliance with Municipal Code Title 15, *Buildings and Construction*, which adopts by reference the 2019 Edition of the California Building Code, which includes site access requirements and other relevant safety precautions to reduce impacts to police protection services. Construction-related impacts concerning police protection services would be less than significant.

[2] Town of Mammoth Lakes, *Police Department*, http://www.mammothlakespd.org/Directory.aspx?DID=20, Accessed January 31,2021.

Operations

Project operations are not anticipated to increase response times to the project site or surrounding vicinity or require the construction of new or physically altered police protection facilities, as the proposed operations are associated with an existing facility and the existing MLPD police station is located approximately 1.1 miles from the project site. There would be no change in use that would result in a substantial increase in the need for police protection services. Any minor increase in project demands would be offset through payment of relevant development impact fees and through property, sales, and utility taxes paid to the Town's General Fund. The project would be subject to review by the MLPD to ensure that the project complies with public safety and crime prevention requirements. Operational impacts concerning police protection services would be less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

iii. Schools?

Less Than Significant Impact. The project site is served by the Mammoth Unified School District (MUSD). The MUSD provides educational services to students in grades kindergarten through 12 at Mammoth Elementary School, Mammoth Middle School, Mammoth High School, and Sierra High School. Table 4.15-1, *Schools Serving the Project Site*, identifies the school locations and existing enrollment at each school serving the project site.

Table 4.15-1
Schools Serving the Project Site

School	Distance from Project Site (miles)	Enrollment (2019-2020)[1]
Mammoth Unified School District		
Mammoth Elementary School 1500 Meridian Boulevard Mammoth Lakes, CA 93546	0.28	534
Mammoth Middle School 1600 Meridian Boulevard Mammoth Lakes, CA 93546	0.45	349
Mammoth High School 365 Sierra Park Road Mammoth Lakes, CA 93546	0.57	295
Sierra High School (Continuation) 461 Sierra Park Road Mammoth Lakes, CA 93546	0.68	8

Note
1. California Department of Education, *Data Quest*, http://dq.cde.ca.gov/dataquest/, accessed February 8. 2021.

Construction

Project construction would not involve impacts to MUSD school services. Construction would be temporary and would not generate additional population or students that would enroll and MUSD schools. Additionally, construction activities would not affect access points or roads serving these schools. Impacts in this regard would be less than significant.

Operations

Project operations are not anticipated to require the construction of new or physically altered school facilities. Impacts to MUSD school facilities would be offset through payment of required development impact fees. According to the General Plan PEIR, additional funds are collected through a local bond measure by the County tax collector on behalf of MUSD. Pursuant to Government Code Section 65996, school fees imposed through the Education Code are deemed to be full mitigation for new development projects; thus, payment of school impact fees would offset the cost of providing service for the students generated by the project. Operational impacts concerning school services would be less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

iv. Parks?

Less Than Significant Impact. The Mammoth Lakes Parks and Recreation Department manages and maintains the Mammoth Ice Rink, Whitmore Track and Sports Field, Community Center Tennis Courts, Mammoth Creek Park, Shady Rest Park, Volcom Brothers Skate Park, and the Whitmore Recreation Area.[3] The Volcom Brothers Skate Park is adjacent to the project site, and is located southeast of the project.

Construction

Project-related construction activities would be temporary and would not generate an increase in demand for park facilities. No impacts would occur in this regard.

Operations

Project operations are not anticipated to require the construction of new or physically altered park facilities. Nonetheless, the project would be subject to payment of development impact fees in compliance with Municipal Code Chapter 15.16, *Special Fees*. Payment of development impact fees pursuant to Municipal Code Chapter 15.16 would ensure the project's operational impacts related to park facilities would be less than significant.

Mitigation Measures: No mitigation measures are required.

[3] Town of Mammoth Lakes, *Parks & Facilities*, https://www.ci.mammoth-lakes.ca.us/322/Parks-Facilities-Trails, accessed on February 8, 2021.

v. Other public facilities?

Less Than Significant Impact. Library services for the Town of Mammoth Lakes are provided by the Mono County Library System. The project site would be served by the Mammoth Lakes Library Brach located at 400 Sierra Park Road, approximately 1.0 mile southwest of the project site. The Mammoth Lakes Library is approximately 17,000 square feet and offers a diverse selection of books, audio books, and DVDs. The Library is a joint-use facility with Cerro Coso Community College and serves students as their research facility.[4]

Construction

Project-related construction activities would be temporary and would not generate an increase in demand for library facilities. No impacts would occur in this regard.

Operations

Project operations are not anticipated to require the construction of new or physically altered library facilities. Nonetheless, the project would be subject to payment of development impact fees to the Mono County Office of Education Facilities in compliance with Municipal Code Chapter 15.16, *Special Fees*. Payment of development impact fees pursuant to Municipal Code Chapter 15.16 would ensure the project's operational impacts related to library facilities would be less than significant.

Mitigation Measures: No mitigation measures are required.

[4] Mono County Libraries, *Mammoth Lakes*, https://monocolibraries.org/branches/mammoth-lakes, accessed on February 9, 2021.

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4.16 RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				✓
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✓

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. The proposed project is not anticipated to increase the use of the Town of Mammoth Lake's available recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. As noted in Response 4.14(a), the project would result in three net new jobs. This negligible increase in employment would not result in substantial population growth in the Town that could result in any noticeable increase in use of recreational facilities. No impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The proposed project would involve the expansion of an existing transfer station and the relocation of the existing buy-back/recycling center and the fleet maintenance operations within the project site. As such, the project would not include recreational facilities or require the construction or expansion of existing recreational facilities. No impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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4.17 TRANSPORTATION/TRAFFIC

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			✓	
b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			✓	
c Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✓	
d. Result in inadequate emergency access?		✓		

Existing Roadway System

State Route 203 (SR-203) is located east of the Town's limits and intersects US-395. SR-203 is a four-lane minor arterial road from US-395 and the roadway serves as a primary form of access to interstate freeways for the Town. Meridian Boulevard, which is classified by the General Plan as a minor arterial roadway, splits off from SR-203 just west of the Town limits where it is comprised of a two-lane roadway with turn lanes. Meridian Boulevard briefly changes to a four-lane roadway between Old Mammoth Road and Sierra Park Road. Old Mammoth Road is a two-lane roadway with a center turn lane that travels through the Town, beginning at its intersection with Main Street and travelling south and west. Old Mammoth Road is classified by the General Plan as a minor arterial roadway.

Existing Transit System

According to the General Plan Mobility Element, the existing transit system in the Town serves most of the major destinations within the community. This includes recreation portals, commercial areas, employment centers, and schools. The Eastern Sierra Transit Authority provides transit services to the Town. All routes within the Town are free and services vary by season. Specifically, the Purple Line provides local service on a year-round basis, with the closest stop to the project site located along Meridian Boulevard at its intersection with Wagon Wheel Road.

Existing Bicycle and Pedestrian Facilities

Pedestrian and bicycle access is not currently provided on Commerce Drive or Meridian Boulevard in the vicinity of the project site. Although there are no designated bike lanes or sidewalks on adjacent roadways, the Meridian Connector Class I Multi-Use Path is located west of Meridian Boulevard and north and east of the project site. The Meridian Connector crosses Commerce Drive to the east of the

59 Commerce Drive site, near the intersection of Commerce Drive and Meridian Boulevard. The bike crossing is currently striped as a standard crosswalk and signed with a bike crossing warning sign with a 'Bike Xing' text sign. The existing trail is designated by the General Plan as an "Existing Class I Multi-Use Path" and the *Town of Mammoth Lakes Parks and Recreation Master Plan* (Parks and Recreation Master Plan) as a "groomed trail"; refer Figure 4, *Existing Public Parks, Recreation* Facilities, of the Parks and Recreation Master Plan.

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

***Less Than Significant Impact*.**

Roadways

Refer to Response 4.17 (b) for an analysis of project impacts to roadway capacities.

Transit Facilities

The goals and policies outlined in the General Plan aim to improve the Town's existing transit network in part by increasing the availability of service. The General Plan Policy M.12.1 aims to expand and increase the reliability of transit service to meet community needs. General Plan Mobility Element Figure 3-5, *Transit Network*, does not identify any existing or planned transit lines within the project vicinity. Additionally, there are no existing transit facilities (e.g., bus/trolley stops) within the project vicinity. Therefore, project implementation would not impact existing transit facilities and the project would not conflict with any polices aiming to expand transit services. As such, impacts in this regard would be less than significant.

Bicycle and Pedestrian Facilities

As discussed above, the existing multi-use path (Meridian Connector) is located east of the project site and to the north of Meridian Boulevard and crosses Commerce Drive approximately 180 east of the 59 Commerce Drive Site via a striped crossing.

The General Plan Mobility Element identifies the following goals and policies applicable to the proposed project:

- Goal M.8. – Support "feet-first" objectives by providing a linked year-round recreational and commuter pedestrian system that is safe and comprehensive.

- Policy M.8.1 – Ensure that all planning processes identify and implement pedestrian improvements and that new development improves existing conditions to meet Town standards.

Implementation of the proposed project would increase the number of trucks accessing the project site as a result of the expansion of the transfer station facility. As detailed in Response 4.17(c), the Town would impose a condition of approval that the project Applicant install a rectangular rapid-flashing beacon (RRFB) with pedestrian activation to minimize safety hazards for pedestrians and bicyclists crossing

Commerce Drive. Therefore, compliance with conditions of approval imposed on the project would ensure that the project would not conflict with policies pertaining to the existing multi-use path. Development of the proposed project would not result in any other impacts to the existing bicycle or pedestrian facilities. As such, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. The State of California Governor's Office of Planning and Research (OPR), in implementing Senate Bill 743 (SB 743), issued proposed updates to the CEQA guidelines in November 2017 that amends the Appendix G question for transportation impacts to delete reference to vehicle delay and level of service (LOS) and instead refer to Section 15064.3, subdivision (b)(1) of the CEQA Guidelines asking if the project would result in a substantial increase in vehicle miles traveled (VMT). The California Natural Resources Agency certified and adopted the revisions to the CEQA Guidelines in December of 2018, and as of July 1, 2020 the provisions of the new section are in effect statewide. Concurrently, OPR developed the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory) (December 2018), which provides non-binding recommendations on the implementation of VMT methodology which has significantly informed how VMT analyses are conducted in the State. Pursuant to CEQA Guidelines Section 15064.3(b)(3), the Technical Advisory identifies and recommends screening thresholds that may be utilized by lead agencies to screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing. The Town recently adopted VMT screening thresholds (December 2020), which are utilized to evaluate the project's potential VMT impacts.

Screening Criteria: Local Essential Services

As permitted by SB 743, the Town has adopted screening criteria to determine if a specific project requires a complete VMT analysis. The purpose of this screening criteria is to determine if a presumption of a non-significant transportation impact can be made on the facts of the project. The intent of this process is primarily to avoid unnecessary analysis and findings that would be inconsistent with the intent of SB 743. As such, per the Town's adopted screening criteria, detailed CEQA transportation analysis is not required for land use entitlements of a project that meet the following screening criteria.

- **Small Projects –** This applies to projects with low trip generation per existing CEQA exemptions. Note that this includes any land use type (residential, office, open space, neighborhood parks, etc.).

- **Local-Serving Retail –** The introduction of new Local-serving retail has been determined to reduce VMT by shortening trips that would occur out of necessity (groceries, other essentials, etc.).

- **Affordable Housing –** Lower-income residents make fewer trips on average, resulting in lower VMT overall.

- **Local Essential Service –** As with Local-Serving Retail, the introduction of new Local Essential Services shortens non-discretionary trips by putting those goods and services closer to residents, resulting in an overall reduction in VMT.

- **Map-Based Screening –** This method eliminates the need for complex analyses by allowing existing VMT data to serve as a basis for screening smaller developments.

- **Redevelopment Projects –** Projects with lower VMT than existing on-site uses can under limited circumstances be presumed to have a non-significant impact.

The *Mammoth Disposal VMT Analysis Memorandum* (VMT Analysis), prepared by LSC Transportation Consultants, Inc. (LSC), dated February 22, 2021, was prepared consistent with the Town's adopted thresholds criteria; refer to Appendix F, *Transportation Analysis*. As such, the VMT Analysis determined that the proposed project satisfies the criteria as a "Local Essential Service".

Municipal solid waste from the Town of Mammoth Lakes and surrounding communities is currently disposed of at the Benton Crossing Landfill, located in unincorporated Mono County approximately 9.5 miles northeast of the Town, either directly by individual patrons or via Mammoth Disposal route trucks. As the Benton Crossing Landfill is anticipated to reach capacity and will stop receiving waste by January 1, 2023, such municipal solid waste will have to be transported to other landfill facilities located further from waste source locations (refer to Exhibit 2-1, *Regional Vicinity*).

The purpose of the proposed project is to increase handling volume capacity for municipal solid waste at the existing Town of Mammoth Lakes Mammoth Disposal Transfer Station such that individual patrons and route trucks from Mammoth Lakes and the surrounding community can dispose of waste at the Transfer Station (closer to the waste source locations). The municipal solid waste would then be sorted, compacted, and consolidated at the Transfer Station into haul trucks (larger than the facility is currently capable of handling) for transporting to an off-site landfill facility in lieu of individual patron or route truck trips, thus resulting in fewer vehicle miles travelled (VMT) for disposal-related trips accessing the surrounding vicinity.

Thus, as determined by the VMT Analysis, the project qualifies under the land use category "government offices: in person services such as post office, library, and utilities" and was determined to be designated as a "Local Essential Service." Therefore, the project is screened out as a non-significant transportation (VMT) impact. Accordingly, less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

c Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. Implementation of the proposed project would not result in substantial increased hazards due to a geometric design feature or incompatible uses. The existing driveways for the 59 Commerce Drive site and the 24 Commerce Drive site would be modified to accommodate truck ingress/egress. The project proposes appropriate internal circulation as well as appropriate truck turning movements for ingress/egress at both the 59 Commerce Drive Site (as shown on Exhibit 2-4, *Transfer*

Station Facility Conceptual Site Plan) and 264 Commerce Drive Site (as shown on Exhibit 2-6, *Recycling Center Conceptual Site Plan*). As such, impacts in this regard would be less than significant.

As discussed in Response 4.17(a), implementation of the proposed project would increase the number of trucks accessing the project site as a result of the expansion of the transfer station facility. As such, increased trucks would be turning from Meridian Boulevard onto Commerce Drive and would cross the multi-use path. Commerce Drive at this location has a speed of less than 40 miles per hour. Based on the Mammoth Disposal Transportation Analysis, prepared by LSC Consultants, dated February 22, 2021, traffic queues along Commerce Drive were considered to determine if the project would block non-motorized access at the crossing. The analysis determined that the resulting traffic queue would be a maximum of no more than one vehicle long for 95 percent of the time. As such, truck queuing is not anticipated to block pedestrian/bicycle access along the Meridian Connector multi-use path crossing. Notwithstanding, the Town is requiring a condition of approval that the project Applicant install a RRFB with pedestrian activation at the crossing location to promote pedestrian/bicycle safety at the crossing. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

d) Result in inadequate emergency access?

Less Than Significant Impact with Mitigation Incorporated. There are two driveways (one paved and one gravel) along Commerce Drive that serve as access points to the 59 Commerce Drive Site. There is one paved shared driveway along Commerce Drive that serves as access to the 264 Commerce Drive Site. The project would reconstruct existing driveways, as appropriate to accommodate proposed truck traffic. The project would also install a new 30-foot wide secondary emergency access gate along a private alley to the west of the 59 Commerce Drive Site. All proposed improvements would be subject to compliance with emergency access standards and requirements specified by State Fire Code and Municipal Code Section 17.44.110, *Driveways and Site Access*. All appropriate fire and emergency access conditions would be incorporated into the design of the project. In addition, the project would be prohibited from impeding emergency access for adjacent or surrounding properties during construction or operation.

Construction phase of the project would require partial temporary lane closures along Commerce Drive in order to install proposed utility connections. The project Applicant would be required to implement a Traffic Management Plan (TMP) to maintain emergency access during the construction process (Mitigation Measure TRA-1). With the implementation of Mitigation Measure TRA-1, and with compliance with State and Town regulations pertaining to emergency access, impacts in this regard would be reduced to less than significant levels.

Mitigation Measures:

TRA-1 Prior to issuance of a grading permit, the project Applicant shall prepare a Traffic Management Plan (TMP) for approval by the Town's Traffic Engineer. The TMP shall specify that one lane of travel in each direction on Commerce Drive must always be maintained during project construction activities. The TMP shall include measures such as construction signage, limitations on timing for lane closures to avoid peak hours of truck traffic, temporary

striping plans, and, if necessary, use of construction flag person(s) to direct traffic during heavy equipment use. The TMP shall be incorporated into project specifications for verification prior to final plan approval.

4.17 TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	**Potentially Significant Impact**	**Less Than Significant Impact With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				✓
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		✓		

As of July 1, 2015, California Assembly Bill 52 (AB 52) was enacted and expanded CEQA by establishing a formal consultation process for California tribes within the CEQA process. The bill specifies that any project may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to "begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the proposed project." Section 21074 of AB 52 also defines a new category of resources under CEQA called "tribal cultural resources." Tribal cultural resources are defined as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is either listed on or eligible for the California Register of Historical Resources (CRHR) or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource.

On February 19, 2016, the California Natural Resources Agency proposed to adopt and amend regulations as part of AB 52 implementing Title 14, Division 6, Chapter 3 of the California Code of Regulations, CEQA Guidelines, to include consideration of impacts to tribal cultural resources pursuant to Government Code Section 11346.6. On September 27, 2016, the California Office of Administrative Law approved the amendments to Appendix G of the CEQA Guidelines, and these amendments are addressed within this environmental document.

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?:

No Impact. Refer to Response 4.5(a) and Appendix B, *Cultural Resources Technical Memorandum*. No known historical resources listed or eligible for listing in a State or local register of historic resources are located within the project site. Thus, no impacts related to historic tribal cultural resources defined in Public Resources Code Section 5020.1(k) would occur.

***Mitigation Measures*:** No mitigation measures are required.

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact With Mitigation Incorporation. In compliance with AB 52, the Town of Mammoth Lakes distributed letters notifying each tribe that requested to be on the Town's list for the purposes of AB 52 of the opportunity to consult with the Town regarding the proposed project. The letters were distributed by certified mail on February 3, 2021. The tribes had 30 days to respond to the Town's request for consultation. No tribal representatives engaged in consultation with the Town during the 30-day tribal consultation period.

It is acknowledged that after notification, the Town of Mammoth Lakes received updated tribal contact information regarding the Town's AB 52 List of Tribes requesting notification. As such, for the purpose of providing a good faith effort to solicit tribal consultation and information sharing regarding the project, Town staff provided an informational letter to the updated list of tribal contacts regarding the proposed project and findings of the *Cultural Resources Identification Report for the Mammoth Disposal Waste Transfer Station Project, Mammoth Lakes, Mono County, California* (Cultural Report), prepared by Michael Baker International, dated April 22, 2021; refer to Appendix B, *Cultural Resources Report*.

As a follow up to the information letter sent by the Town, Chairperson Charlotte Lange, Mono Lake Indian Community, requesting consultation with Town staff regarding the project on March 18, 2021. Consultation was conducted via teleconference on April 2, 2021 with Town staff, Michael Baker staff, and Chairperson Lange in order to discuss the proposed project and any concerns Chairperson Lange may have.

As discussed in Response 4.5(b), the region remains highly sensitive for prehistoric period archaeological resources and potentially significant cultural deposits may exist beneath the project site; refer to Response 4.5(b), the project site is sensitive for possible buried prehistoric period archaeological resources and potentially significant cultural deposits may exist beneath the project site. Development of the proposed project would require excavation activities as deep as approximately eight feet below ground surface. As such, Mitigation Measure CUL-1 requires the preparation and implementation of a Workers Environmental Awareness Program training prior to project commencement. Mitigation Measure CUL-2 requires archaeological and Native American monitoring during initial ground disturbances associated with the project and/or until the monitor determines that monitoring is no longer necessary. Mitigation Measure CUL-2 also requires all construction work to halt if cultural resources are encountered during ground disturbing activities until a qualified archaeologist can evaluate the find. Following implementation of Mitigation Measures CUL-1 and CUL-2, impacts concerning undiscovered tribal cultural resources would be reduced to less than significant levels.

***Mitigation Measures*:** Refer to Mitigation Measures CUL-1 and CUL-2.

4.19 UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			✓	
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			✓	
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✓	
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✓	
e. Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?			✓	

a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

***Less Than Significant Impact*.**

Water

Water service in the Town of Mammoth Lakes is provided by the Mammoth Community Water District (MCWD). Per utility correspondence between the Applicant and MCWD, the project site is serviced by two existing 0.75-inch connections and would both serve up to 39 fixture units.[1] As discussed in Section 2.0, *Project Description*, the 0.75-inch connection at the 59 Commerce Drive Site would continue to be used for proposed operations unless utility conflicts occur during construction. In the event that utility conflicts occur during construction, a new 0.75-inch connection may be installed, which would remain in operation until the new office building is constructed. As such, the site may be served with two 0.75-inch connections for a short period of time, pending demolition and removal of the existing office building and meter. If necessary, the new 0.75-inch connection installation would be subject to compliance with all applicable local, State, and Federal laws, ordinances, and regulations. No changes are proposed to the existing water supply connection at the 264 Commerce Drive Site. Pursuant to MCWD, the existing

[1] Mammoth Community Water District, electronic mail correspondence with the Kristina Roberts, Permit Official and Inspections, on January 22, 2021.

meters serving both the 59 Commerce Drive Site and the 264 Commerce Drive Site have available capacity for additional plumbing fixtures for the renovation/expansions at these locations.[2]

MCWD also provides fire suppression water to the project site with existing main lines along Commerce Drive. There are two existing hydrants located near the northeast and northwest corners of the 59 Commerce Drive Site. The project would install a 4-inch lateral connection for a Fire Department Connection (FDC) located near the street side of the new office building which would service both the new office and transfer station buildings. The 4-inch lateral FDC installation would be subject to compliance with all applicable local, State, and Federal laws, ordinances, and regulations. Additionally, the existing building at the 264 Commerce Drive Site has a fire sprinkler system and no changes to this system are proposed.

The project's potential impacts to the environment, including activities associated with the installation of the 4-inch lateral FDC and the possibility of a new 0.75-inch water connection to serve the project, are analyzed within this IS/MND. No new off-site water facilities are anticipated or proposed, and no existing facilities are proposed to be expanded, as the MCWD has confirmed that the existing meters have capacity for the proposed renovations/expansion. As such, less than significant impacts would occur in this regard.

Wastewater Treatment

MCWD also provides wastewater treatment for the Town through its own Wastewater Treatment Plant which provides advanced secondary treatment including biological treatment, filtration, and disinfection through utilization of chlorine. According to MCWD's *2015 Urban Water Management Plan* (UWMP), the Wastewater Treatment Plant has a capacity for 4.05 million gallons per day (MGD) and processed 1,083 acre-feet of wastewater in 2015.[3] Treated wastewater is discharged to Laurel Pond, located approximately 5.5 miles southeast of Mammoth Lakes. Laurel Pond provides secondary treatment of approximately 1,145 acre-feet per year to approximately 1,677 acre-feet per year in 2030.

Per utility correspondence with the MCWD, the 59 Commerce Drive Site is serviced by an existing 6-inch sewer lateral that is active to the property line and is available for connections.[4] However, the 264 Commerce Drive Site's existing 6-inch sewer lateral needs to be field verified by MCWD to confirm its size.[5] The project would intercept and extend the existing 6-inch lateral service connection at the 59 Commerce Drive Site to connect to the sewer lines from the new transfer station and office building. The scale house and fleet maintenance building would not have sewer connections, as these utilities would not be necessary for these buildings. The 264 Commerce Drive Site has existing restroom facilities in the on-site building and no changes are proposed to the existing sanitary sewer service. Should the MCWD determine that the existing on-site 6-inch sewer lateral at the 264 Commerce Drive Site is necessary, these improvements would be designed and included as part of the project's design phase prior to construction, as required by the Town's Municipal Code. The project's potential impacts to the

[2] Mammoth Community Water District, electronic mail correspondence with the Kristina Roberts, Permit Official and Inspections, on January 22, 2021.
[3] Mammoth Community Water District, *2015 Urban Water Management Plan*, January 2017.
[4] Mammoth Community Water District, electronic mail correspondence with the Kristina Roberts, Permit Official and Inspections, on January 22, 2021.
[5] Ibid.

environment, including activities associated with the extension of the existing connection to serve the project, are analyzed within this IS/MND. No new off-site wastewater treatment facilities are required or proposed, nor are any other existing facilities required to be expanded, other than those connection improvements discussed herein. The project does not include any growth-inducing land uses and is consistent with the Town's General Plan. Thus, wastewater generated from project implementation could be accommodated by the Wastewater Treatment Plant, pursuant to Lahontan Regional Water Quality Control Board (RWQCB) requirements. As such, project implementation would not result in an exceedance of wastewater treatment requirements and impacts would be less than significant.

Stormwater Drainage

The existing 59 Commerce Drive Site is relatively flat with topography sloping one to three percent generally from south to north. The proposed project would include site grading generally less than two feet in depth to accommodate the new structures and buildings. Surface paving would be sloped towards collection drains/inlets and utilize an underground infiltration system. The existing drywell and infiltration trench would either be removed or abandoned and no longer used. The existing 264 Commerce Drive Site is relatively flat with topography sloping approximately one to three percent generally from north to south across impervious paved surfaces. The site has a system of trench drains and drop inlets/dry wells to control stormwater runoff. Existing drainage infrastructure would be required to comply with current Town requirements regarding site drainage. Although the proposed project is not anticipated to increase the runoff at this location, the existing drywells would be updated to meet the existing Municipal Code requirements. These proposed improvements would include expansion of the existing drywells to hold an additional 468 cubic feet (cf) of water, for a total of 1,768 cf of volume storage. The proposed expanded drywells would also include intercepting and connecting the existing slotted drain and oil-water separator in front of the building to the proposed drywell system. The former connection of the oil-waste separator to the public sewer system would be removed. Last, the project would install a new Asphaltic Concrete (AC) swale near the south end of the property to direct stormwater runoff from the site into the south drywell.

The project's potential environmental impacts, including activities associated with the construction of the proposed stormwater improvements, are analyzed within this IS/MND. Construction of the storm drain improvements would be subject to compliance with all applicable local, State, and Federal laws, ordinances, and regulations. No other new off-site stormwater facilities are anticipated to be required, nor are other off-site existing facilities anticipated to be expanded as a result of the proposed project. Consistency with the Town's Municipal Code would ensure that the infiltration system meets the existing code requirements regarding sizing capacity. The hydrologic analysis included in Appendix D, *Hydrologic Analysis and Data*, identifies drainage areas and peak flow rates for existing and proposed project conditions for both the 20-year and 100-year storm events. This analysis further calculates the required storm water volumes for each site location in order to mee the Town's requirements and summarizes the proposed project's water volume storage. At both the 59 Commerce Drive Site and 264 Commerce Drive Site, the proposed water volume storage would exceed the Town's requirements and would be more that the existing conditions. As such, less than significant impacts would occur in this regard.

Dry Utilities

Electricity and liquid propane gas (LPG) services at the project site are currently provided by Southern California Edison (SCE) and AmeriGas, respectively. Telecommunication services are provided by Verizon, AT&T, Suddenlink, Frontier Communications, and Hughes Net.[6] The proposed facility at the 59 Commerce Drive Site would construct a new connection to an existing underground LPG gas main within Commerce Drive and extend service to the street side of the office building. An additional gas lateral may be added for the fleet maintenance building, or the existing LPG tank near the building may continue to be used. Additionally, the project would install a new subpanel on the side of the transfer station building. The existing underground power lines for the office building would be removed and new electricity service to the transfer station and office buildings would be provided via underground power lines from the existing panel at the relocated fleet maintenance facility building. The existing overhead power lines from the attendant shack to the relocated fleet maintenance facility building and overhead power lines from two light poles at the eastern property line would be removed. New service lines for the two light poles would be underground. Overall, all new electricity infrastructure would be underground and no existing overhead power lines on-site would remain. At the 264 Commerce Drive Site, no changes are proposed for the LPG that is supplied by two existing tanks near the southwest corner of the site. However, a permit would be required to extend the underground electrical conductor from the existing service panel to the household hazardous waste container. The project's potential environmental effects for construction of these utility improvements are analyzed throughout this IS/MND. Additionally, construction of the project's dry utilities would be subject to compliance with all applicable local, State, and Federal laws, ordinances, and regulations. Compliance with the relevant laws, ordinances, and regulations would ensure the project's construction-related environmental impacts are reduced to less than significant levels.

Mitigation Measures: No mitigation measures are required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. As noted above, MCWD would continue to service to the project site. Based on MCWD's UWMP, MCWD is able to meet projected demands during normal, dry, and multiple dry years through 2035; refer to Tables 4.19-1, *Normal Year Supply and Demand Comparison*, through 4.19-3, *Multiple Dry Year Supply and Demand Comparison*.

[6] Town of Mammoth Lakes, *Utilities Contacts*, https://www.townofmammothlakes.ca.gov/274/Utilities-Contacts, April 19, 2021.

Table 4.19-1
Normal Year Supply and Demand Comparison

	2020	2025	2030	2035
Supply Totals	2,299	2,656	3,406	3,763
Demand Totals	2,264	2,611	3,370	3,719
Difference	35	45	36	43
Notes: Units are in acre-feet. (AFY)				
Source: Mammoth Community Water District, *2015 Urban Water Management Plan*, January 2017.				

Table 4.19-2
Single Dry Year Supply and Demand Comparison

	2020	2025	2030	2035
Supply Totals	2,299	2,656	3,406	3,763
Demand Totals	1,831	2,109	2,741	3,020
Difference	468	547	665	743
Notes: Units are in acre-feet. (AFY)				
Source: Mammoth Community Water District, *2015 Urban Water Management Plan*, January 2017.				

Table 4.19-3
Multiple Dry Year Supply and Demand Comparison

		2020	2025	2030	2035
First Year	Supply Totals	2,299	2,656	3,406	3,763
	Demand Totals	2,264	2,611	3,370	3,719
	Difference	35	45	36	44
Second Year	Supply Totals	2,299	2,656	3,406	3,763
	Demand Totals	1,831	2,109	2,741	3,020
	Difference	468	547	665	743
Third Year	Supply Totals	2,299	2,656	3,406	3,763
	Demand Totals	1,831	2,109	2,741	3,020
	Difference	468	547	665	743
Notes: Units are in acre-feet. (AFY)					
Source: Mammoth Community Water District, *2015 Urban Water Management Plan*, January 2017.					

MCWD is anticipated to have adequate water supply to serve the project site under average, single-dry, and multiple-dry year conditions. As discussed in Response 4.19(a), the MCWD maintains its water system and would continue to serve the project site. The project would be consistent with the intended principal uses of the Industrial (I) land use designation and would not foster unanticipated population growth capable of significantly impacting utilities. As a result, project implementation is not anticipated to require or result in the construction of new off-site water facilities or expansion of existing facilities, other than the proposed connections to the existing system. As the MCWD's UWMP is based on the Town's assumptions for buildout of the General Plan, the MCWD's UWMP has captured consideration of buildout of the project site as an industrial use. MCWD is anticipated to have adequate water supply

to serve the project site under average, single-dry, and multiple-dry year conditions. As such, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. Refer to Response 4.19(a). Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Mammoth Disposal Company provides solid waste collection for the Town as well as processing at the project site. After processing, the Town's solid waste is disposed at the four landfills identified in Table 4.19-4, *Landfills Serving the Town*.[7]

Table 4.19-4
Landfills Serving the Town

Landfill/Location	Maximum Daily Throughput (tons per day)	Remaining Capacity (cubic yards)	Anticipated Closure Date
Benton Crossing Landfill 899 Pit Road / off Owens River Road, Whitmore Hot Springs, CA 93512	500	695,047	12/31/2023
El Sobrante Landfill 10910 Dawson Canyon Road, Corona, CA 91719	16,054	143,977,170	1/1/2051
McKittrick Waste Treatment Site 56533 Highway 58, McKittrick, CA 93251	3,500	769,790	12/31/2059
Potrero Hills Landfill 3675 Potrero Hills Lane, Suisun City, CA 94585	4,330	13,872,000	2/14/2048
Russell Pass Sanitation Landfill 55 West Williams Ave, Fallon, NV 89406	580	12,814,049	2137

Sources: California Department of Resources Recycling and Recovery, *SWIS Facility/Site Search*, https://www2.calrecycle.ca.gov/SolidWaste/Site/Search, accessed February 15, 2021.
Nevada Division of Environmental Protection, electronic mail correspondence with the Michael Ruffner, Bureau of Sustainable Materials Management, on February 26, 2021.
Nevada Division of Environmental Protection, *Fact Sheet*, https://ndep.nv.gov/uploads/land-waste-solid-fac-docs/russell-pass-fact-sheet.pdf, accessed March 3, 2021.

[7] CalRecycle, *Jurisdiction Disposal by Facility and Alternative Daily Cover (ADC) Tons by Facility*, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility, accessed February 15, 2021.

Construction

Project construction is not anticipated to generate significant quantities of solid waste with the potential to affect the capacity of regional landfills. All construction activities would be subject to conformance with relevant Federal, State, and local requirements related to solid waste disposal. Specifically, the project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (AB 939), which requires all California cities "reduce, recycle, and re-use solid waste generated in the State to the maximum extent feasible." AB 939 requires that at least 50 percent of waste produced is recycled, reduced, or composted. The project would also be required to demonstrate compliance with the 2019 Green Building Code, which includes design and construction measures that act to reduce construction-related waste though material conservation and other construction-related efficiency measures. Compliance with these programs would ensure the project's construction-related solid waste impacts would be less than significant.

Operation

The purpose of the project's operations is to sort, compact, and transport solid waste to an off-site end point as well as sort, organize, and ship recyclable materials to various bulk recyclers or processing facilities. Increasing tonnage of waste accepted at the project site would not result in an increase in the total waste stream but would shift the waste processing location. The proposed project is intended to improve on-site operations, increase efficiencies, and increase the amount of solid waste and recyclable materials processed at the project site. The transfer station is anticipated to receive an average of 78 tons per day with a peak throughput of 301 tons per day. Under the solid waste facilities permit (SWFP), the facility would be permitted to receive up to 500 tons per day. Nevertheless, the facility is designed to handle a throughput of up to 543 tons per day and has a storage capacity (floor space) of 144 tons. Additionally, similar to existing conditions the buy-back/recycling center would be able to accept up to 80 tons per day. As such, with approval of the SWFP the project is not anticipated to generate solid waste in excess of State or local standards, in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

e) Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Refer to Response 4.19(d). The proposed project would comply with all Federal, State, and local statutes and regulations related to solid waste, including AB 939. Specifically, the project would be required to recycle, reduce, or compost at least 50 percent of construction and demolition debris. Further, it is acknowledged that the project includes maintaining (relocating) the existing buy-back/recycling center. As such, Town residents would still be able to utilize the on-site buy-back/recycling center, encouraging solid waste reduction in Town. Compliance with existing laws and regulations would ensure the project's impacts related to solid waste are reduced to less than significant levels.

Mitigation Measures: No mitigation measures are required.

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4.20 WILDFIRE

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?				✓
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✓
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✓
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				✓

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. According to the *Mono County Fire Hazard Severity Zones in SRA Map*, the project site is not located in or near a State responsibility area. [1] According to the *CalFire Draft Fire Hazard Severity Zones in LRA Map* the project site is not designated as a very high fire hazard severity zone.[2] Thus, no impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. Refer to Responses 4.15(a)(1) and 4.20(a).

Mitigation Measures: No mitigation measures are required.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation measures are required.

[1] California Department of Forestry and Fire Protection, Office of the State Fire Marshal, *Mono County Fire Hazard Severity Zones in SRA Map*, https://osfm.fire.ca.gov/media/6722/fhszs_map26.pdf, adopted November 7, 2007.

[2] California Department of Forestry and Fire Protection, Office of the State Fire Marshal, *Draft Fire Hazard Severity Zones in LRA Map, dated* September 2007.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation measures are required.

4.19 MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		✓		
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		✓		
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		✓		

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact with Mitigation Incorporated. As discussed in Section 4.4, *Biological Resources*, the project would not result in direct impacts to any sensitive species or wildlife habitat and would have no impact to sensitive biological resources. Additionally, the project site does not support historical resources under CEQA Guidelines §15064.5 and development of the proposed project would not adversely impact historic resources; refer to Section 4.5, *Cultural Resources*. According to the Cultural Resources Report, the project site is sensitive for buried cultural (archaeological and tribal cultural) resources. Mitigation Measure CUL-1 and CUL-2 would be implemented during project construction in the event that unanticipated artifacts or cultural resources are unearthed during project construction. Mitigation Measure CUL-1 requires the preparation and implementation of a Workers Environmental Awareness Program training prior to project commencement. Mitigation Measure CUL-2 requires archaeological and Native American monitoring during initial ground disturbances associated with the project and/or until the monitor determines that monitoring is no longer necessary. Mitigation Measure CUL-2 also requires all construction work to halt if cultural resources are encountered during ground disturbing activities until a qualified archaeologist can evaluate the find. Thus, with adherence to Mitigation Measures CUL-1 and CUL-2, impacts would be reduced to less than significant levels.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact with Mitigation Incorporated. A significant impact may occur if a proposed project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. As concluded in Sections 4.1 through 4.20, the proposed project would not result in any significant impacts in any environmental categories with implementation of project mitigation measures. Implementation of mitigation measures at the project-level would reduce the potential for the incremental effects of the proposed project to be considerable when viewed in connection with the effects of past projects, current projects, or probable future projects. Therefore, impacts in this regard would be less than significant with mitigation incorporated.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact with Mitigation Incorporated. Previous sections of this Initial Study reviewed the proposed project's potential impacts related to aesthetics, air quality, noise, hazards and hazardous materials, traffic, and other issues. As concluded in these previous discussions, the proposed project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, following conformance with the existing regulatory framework and mitigation measures. Impacts would be less than significant in this regard.

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